

88073730

FINAL
ENVIRONMENTAL
IMPACT
STATEMENT

PROPOSED
**1985 PLAN
AMENDMENTS**

To The
CALIFORNIA DESERT PLAN
and the
EASTERN SAN DIEGO COUNTY MFP

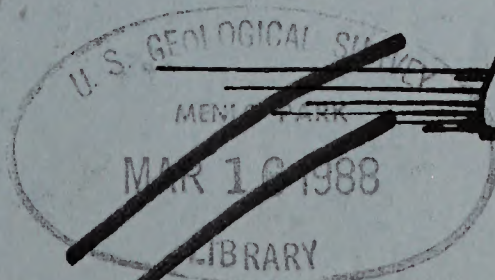


U.S. Department of the Interior

Bureau of Land Management.

California Desert District
SEPTEMBER, 1986

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA DESERT DISTRICT

1695 Spruce Street
Riverside, California 92507

IN REPLY REFER TO:

1600
(C-064)

AUG 15 1986

Dear Reader:

Enclosed for your review and comment is the Final Environmental Impact Statement for the 1985 Plan Amendments to the California Desert Plan and the Eastern San Diego County Management Framework Plan. The Final EIS has been prepared in an abbreviated format consistent with provisions of Section 1500 of 40 CFR, the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act of 1969. Text revisions or additions made in response to public suggestions are also presented. Therefore, this document, together with the Draft EIS, constitutes the Final EIS.

My thanks to those of you who sent in comments and suggestions - I hope that you will continue to help us manage your public lands.

The decision to accept or to reject these proposed amendments will be based on a number of factors including effect on the natural environment, input from the public, and recommendations of the California Desert District Multiple-Use Advisory Council.

We are providing a 60-day period for public review. Final decisions will be announced shortly after the end of that period. Amendments which are accepted will be in effect at the time final decisions are published. Please be sure to return your comments to this office no later than **DEC 31 1986**; protests must be filed with the State Director in Sacramento by the same date. Send your comments to the following address:

California Desert District
Bureau of Land Management
ATTN: Plan Amendments
1695 Spruce Street
Riverside, California 92507

Sincerely,

Gerald E. Hillier
District Manager

#14990232

ID: 88073730

BLM CA ES 86 005 1792

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C.3Final Environmental Impact StatementPROPOSED 1985 AMENDMENTS
TO THE CALIFORNIA DESERT CONSERVATION AREA PLAN
AND THE
EASTERN SAN DIEGO COUNTY MFP.Prepared by
Department of the Interior (U.S.)
Bureau of Land Management
California Desert District

The Bureau of Land Management is conducting its 1985 review of the California Desert Plan and the Eastern San Diego County Management Framework Plan. This Environmental Impact Statement considers the environmental consequences of accepting or rejecting each of the 20 proposed amendments which have been accepted for consideration. Amendments fall into several categories, including desert-wide amendments, multiple-use class changes, ACEC and special area designation and boundary changes, site-specific vehicle access changes, livestock grazing adjustments, reduction of burro population, and a proposed BLM/Navy Cooperative Agreement in Imperial County. Under the Bureau's preferred alternative, 18 amendments would be accepted and two would be rejected. Desert-wide Class C acreage would remain at 1,655,940. Class L would change from 6,259,126 to 6,311,631 Class M would change from 3,365,184 to 3,352,184 Class I would change from 522,610 to 558,240 and unclassified land would change from 314,000 to 239,285.

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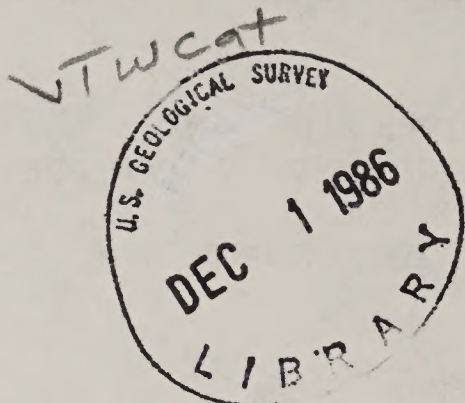
Ed Hunter
STATE DIRECTOR
CALIFORNIA STATE OFFICE

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SUMMARY

PLAN AMENDMENTS

In accordance with the procedures set forth in Chapter 7 of the California Desert Plan and with 43 CFR 1610.5-5 (BLM planning regulations), the Bureau of Land Management, California Desert District, has initiated the fifth amendment review of the plan.

Proposals for amendments were accepted during a 30-day period from March 30 to April 30, 1985. Forty-four amendments were proposed by the public and by the BLM staff for consideration during the review. These proposed amendments were screened by BLM management and the California Desert District Advisory Council to determine which proposals should be considered at this time, which should be deferred or dropped, and which could be handled more appropriately by an administrative action. Twenty amendments were recommended for consideration.

<u>Category</u>	<u>Number</u>	<u>Description</u>
Special	1	BLM/Navy Cooperative Agreement- Imperial County
Desert-wide	2	Revise multiple use class guidelines for agriculture
	3	Revise multiple use class guidelines for communication sites
	4	Revise multiple use class guidelines for waste disposal
	5	Clarify multiple use class guidelines for transmission facilities
	6	Restate goals for plan elements
Multiple Use Class Changes	7	Change multiple use classes in Baker area, including adjustment of boundary of East Mojave National Scenic Area
	8	Change T4S, R6E, Sec. 10, within designated critical habitat of Coachella Valley Fringe-toed Lizard, from unclassified to Class L.
	9	Change all unclassified public lands within "managed" area of Coachella Valley Fringe-toed Lizard habitat to Class L. Designate all newly-acquired public lands in this area as Class L.

<u>Category</u>	<u>Number</u>	<u>Description</u>
	10	Change from Class L to Class M lands in the Panamint Range (in Planning Unit 25) but outside of wilderness study areas.
	11	Change from Class I to Class M the land immediately outside the south boundary of the Johnson Valley Open Area and north of the unclassified area.
	12	Change from Class L to unclassified the Johnson Valley small tract area within sections 20 and 21, T3N, R4E.
ACECs/Special Areas	13	Adjust boundaries of four ACECs as a result of inventory conducted in preparation of ACEC management plans. a. Clark Mountain (No. 19) b. Yuha Basin (No. 64) c. Gold Basin/Rand Intaglio (No. 67) d. Plank Road (No. 72)
	14	Establish a new ACEC at Warm Sulfur Springs in Panamint Valley area to protect marsh habitat.
	15	Reclassify all unclassified lands within the East Mojave National Scenic Area to Class L.
Vehicle Access	16	Revise vehicle access designations for Cadiz Dunes to provide more open area.
Grazing	17	Delete from the Colton Hills Grazing Allotment the portion south of Interstate 40.
Burros	18	Reduce wild horse and burro population to zero in Morongo and Coyote Canyon Herd Management Areas.
	19	Reduce the burro concentration to zero in the Cima Dome Herd Management Area.
Eastern San Diego County MFP	20	Incorporate into the Eastern San Diego County Planning Unit MFP and the EIS lands within T 16S, R 7E, Sec 16 and 20 which were acquired on 10/15/84. These lands would be designated Class L.

ENVIRONMENTAL CONSEQUENCES

Impacts have been assessed for accepting each amendment or one of its alternatives, as well as for rejection of the amendment. Table S-1 summarizes those impacts.

TABLE S-1

CANDIDATE AMENDMENTS - SUMMARY OF IMPACTS

Page 1

X = POSITIVE IMPACT - = NEGATIVE IMPACT

Amend. Number	Amendment	RESOURCES										USES			
		Soil - Air - Water	Botony	Wildlife	Horses - Burros	Cultural Resources	Native Americans	Wilderness	Visual Resources	Livestock Grazing	Recreation	Lands	Geology - Energy - Minerals		
1.	NAVY COOPERATIVE AGREEMENT Alternative A West Side		-	-		-	-					-	-		
	East Side			X		-				-	-	-	-		
	Alternative B (No Action) West Side	-	-	-		-	-								
	East Side	-													
	Alternative C West Side	-	-	-		-	-			X	-	-	-		
	East Side	-		-							-	-	-		
	Alternative D West Side		X	X						-	-	-	-		
	East Side		X	X		X				-	-	-	-		
	Alternative E West Side		X	X							-	-	-		
	East Side		X	X						-	-	-	-		
2.	AGRICULTURAL USES														
3.	COMMUNICATION SITES														
4.	WASTE DISPOSAL														
5.	TRANSMISSION FACILITIES														
6.	PLAN ELEMENT GOALS														
7.	'Unclassified' at BAKER EMNSA BOUNDARY Alternative A											-			

TABLE S-1

CANDIDATE AMENDMENTS - SUMMARY OF IMPACTS

Page 2

X = POSITIVE IMPACT

- = NEGATIVE IMPACT

Amend. Number	Amendment	RESOURCES										USES			
		Soil - Air - Water	Botony	Wildlife	Horses - Burros	Cultural Resources	Native Americans	Wilderness	Visual Resources	Livestock Grazing	Recreation	Lands	Geology - Energy - Minerals		
	Alternative B								X			-			
	Alternative C								X						
	Alternative D														
	Alternative E								X						
8.	CVFTL, Sec. 10, T4S / R6E														
9.	CVFTL HABITAT														
10.	PANAMINT RANGE														
11.	JOHNSON VALLEY OPEN AREA		X	X						X			X		
12.	JOHNSON VALLEY SMALL TRACT AREA											X			
13.	ACEC BOUNDARIES - CLARK MTN (No. 19)			X		X									
	- YUHA BASIN (No. 64)					X									
	- GOLD BASIN/ RAND INTAGLIO (No.67)					X									
	- PLANK ROAD (No. 72)					X									
14.	WARM SULPHUR SPRINGS ACEC	X	X	X											
15.	EMNSA 'Unclassified LANDS Alternative A											-			
	Alternative B											-			

TABLE S - 1

CANDIDATE AMENDMENTS - SUMMARY OF IMPACTS

Page 3

X = POSITIVE IMPACT

- = NEGATIVE IMPACT

Amend. Number	Amendment	RESOURCES								USES			
		Soil - Air - Water	Botony	Wildlife	Horses - Burros	Cultural Resources	Native Americans	Wilderness	Visual Resources	Livestock Grazing	Recreation	Lands	Geology - Energy - Minerals
16.	CADIZ DUNES - MV ACCESS Alternative A	-	-	-		-					X		
	Alternative B	-	-	-		-					X		
	Alternative C	X	X	X		X					-		
17.	COLTON HILLS GRAZING ALLOTMENT Alternative A			X						-			
	Alternative B			X						-			
	Alternative C			-									
18.	WILD HORSES and BURROS - Morongo HMA			X	-								
	- Coyote Canyon HMA			X	-								
19.	CIMA DOME BURRO AREA	X	X	X	-					X			
20.	EAST SAN DIEGO COUNTY MFP												

SELECTION OF PREFERRED ALTERNATIVE

Based in part upon the amendment-specific impacts, the results of the public review of the draft EIS, and the recommendations of the Desert District Multiple Use Advisory Council, a preferred alternative was selected, either to accept, reject, or accept an alternative version of each amendment. This choice does not represent a final decision, but simply indicates a preliminary recommendation to be presented in the final EIS for public review and comment. The cumulative impacts of this preferred alternative are presented in Table S-2 below:

Table S-2

SUMMARY OF CUMULATIVE IMPACTS

<u>Resource</u>	<u>Unit of Measure</u>	<u>No Action</u>	<u>Preferred Alternative</u>	<u>Percent Change</u>	<u>New Percent of Desert</u>
<u>Multiple Use Class</u>					
C	Acres	1,655,940	1,655,940	0	13.7 (17.3)*
L	Acres	6,259,126	6,311,631	+0.8	52.1 (48.8)
M	Acres	3,365,184	3,352,183	-0.4	27.7 (27.5)
I	Acres	522,610	558,240	+6.8	4.6 (4.1)
Unclassified	Acres	314,000	239,285	-23.8	2.0 (2.6)
<u>Motorized Vehicle Access</u>					
Open	Acres	523,000	567,870	+8.5	4.7
Limited	Acres	9,301,860	9,307,670	+0.1	76.8
Closed	Acres	1,978,000	1,982,950	+0.3	16.4
Undesignated	Acres	314,000	258,580	-17.6	2.1
<u>ACECs and Special Areas</u>					
Added	Number	0	1		
	Acres	0	27,850		
Deleted	Number	0	0		
	Acres	0	163		
Net Change	Number	0	+1		
	Acres	0	27,687		

*Percent of Area in Original Plan

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- Map 35 Motorized Vehicle Use-East Side-Alternative E (Decision)

CHAPTER I

AMENDMENTS

CHAPTER I

AMENDMENTS

INTRODUCTION

Twenty proposed amendments to the California Desert Plan have been accepted for consideration. Each amendment has been considered individually for either acceptance or rejection. The rejection of an amendment represents the "no action" alternative. Additional alternatives have been proposed for several of the amendments which present modified versions of the proposal. Each amendment, together with the proponent's rationale, the Bureau's preferred alternative (acceptance, acceptance of a modified version, or rejection), and the rationale for the decision are presented in Table 1-1.

The preferred alternatives for Amendments 1, 7, 17, and 19 have been changed from those recommended in the Draft EIS. For Amendment 1, the Navy/BLM Cooperative Agreement in Imperial County, the preferred alternative for the West Mesa is now Alternative E, a new alternative which incorporates portions of Alternative A (the original preferred alternative), Alternative C (Maximum Use) and Alternative D (Minimum Use). Additional resource data, public comments, and state and other agency input required changes to provide greater protection for cultural resources and wildlife, particularly the flat-tailed horned lizard. Thus, the area southwest of the Superstition Mountains was made Class L instead of Class I. The remaining Class I area was expanded on the north side of the Superstition Mountains and in the Mud Hills to permit continuation of current recreational use patterns and to provide enforceable barriers and ground markings. No changes were made in the preferred alternative for the East Mesa.

Amendment 7, which involves a change in multiple-use class designations in the Baker area and an adjustment in the boundary of the East Mojave National Scenic Area, has been rejected. Unclassified lands suitable for development are already present both south and north of Interstate-15. At this time, there is no need to change the status of public lands south of the freeway. Public input demonstrated a perceived conflict between Scenic Area management and community development at Baker. The management plan now being prepared for the Scenic Area will outline steps to deal with potential management or development conflicts.

Amendment 17, which calls for deletion of the portion of the Colton Hills grazing allotment south of Interstate-40, was originally rejected but is now recommended for acceptance. Further deliberation on the potential conflicts between livestock and bighorn sheep in the Clipper Mountains led to the decision that wildlife consideration outweigh the detriment to the livestock operator of removing this small portion of the allotment.

Amendment 19, which call for the elimination of the Cima Dome Herd Management Area was originally accepted but is now recommended for rejection. Additional analysis indicates that no new information is available to support change from the approved burro population level of 55 animals.

In addition to the assessment of the proposed BLM/Navy Cooperative Agreement in Imperial County as Amendment one in the present document, the Navy has prepared a DEIS on acquisition and management of private lands within the same study area. The Navy document is entitled "DEIS on Land Acquisition and Management Within Range Safety Zones R-1510 and R-2512." It should be released in late September and can be obtained from the Naval Air Facility, El Centro, California. Contents of that DEIS are incorporated into the present EIS by reference.

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
1	<p>SPECIAL</p> <p><u>Change the land use classification and vehicle access of certain lands which would be covered by a cooperative agreement between the BLM and the U.S. Navy in Imperial County.</u></p> <p>A) On the West Mesa:</p> <p><u>Alternative A: Proposed Action.</u> Change the Multiple Use Class (MUC) of 68,250 acres of lands within the Navy lease area from unclassified to MUC L and MUC I (Maps 3 and 7).</p> <p>Change vehicle access on Navy lease lands from undesignated to Open or Limited (Maps 4 and 19)</p> <p><u>Alternative B: Reject Amendment (no action) (Map 7)</u></p> <p><u>Alternative C: Maximum Use (Maps 9, 10)</u></p>	<p>These changes would implement a proposed cooperative agreement between the BLM and the U.S. Navy which would satisfy the current needs for the Navy while assuring public uses. Expected revocation of the existing withdrawal by the Bureau of Reclamation (USBR) would cancel the current Navy/USBR lease, creating the need to recognize existing Navy use of these lands for bombing practice and other aircraft activities. The cooperative agreement would cover approximately 318,000 acres of Federal lands in Imperial County. It would include the following actions:</p> <p>A) On the West Mesa:</p> <p>1) Provide for the Navy to file a withdrawal application (to be approved upon the revocation of the BUREC withdrawal) on target areas (Range Safety Zone (RSZ)A, 33,700 acres).</p> <p>2) Implement cooperative management on areas surrounding the targets. Land use classes within the former Navy lease area would be changed as described. Navy uses and control would be defined in rights-of-way on flight approaches (range safety zone (RSZ B) and cooperative agreement in surrounding areas (RSZ C).</p>	Accept Alt. E	<p>This alternative satisfies the current needs of the Navy while assuring public access to appropriate areas. It provides protection of cultural and wildlife resources as found in the inventory.</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	<p><u>Alternative D: Minimum Use</u> (Map 13)</p> <p><u>Alternative E: Multiple Resources</u> (Maps 32, 33)</p> <p>B) On the East Mesa:</p> <p><u>Alternative A:</u> Change 11,170 acres from MUC L and MUC M to unclassified. Change the area south of Highway 78 within the proposed RSZ B area around Target area 68 from MUC M to MUC L. (Maps 5, 6)</p> <p><u>Alternative B:</u> Reject Amendment (No action) (Map 8)</p> <p><u>Alternative C:</u> Maximum Use (Maps 11, 12)</p> <p><u>Alternative D:</u> Minimum Use (Maps 14, 6)</p> <p><u>Alternative E:</u> Multiple Resources (Maps 34, 35)</p> <p>DESERT-WIDE</p> <p><u>Multiple Use Class (MUC) Guidelines-Agriculture</u></p> <p><u>Alternative A:</u> Change the MUC Guidelines to prohibit agricultural uses (excluding livestock grazing) in MUC M and I. Permit agricultural uses to continue in unclassified lands.</p>	<p>B) On the East Mesa:</p> <p>1) Delete 11,170 acres from the California Desert Plan. This area would be withdrawn and placed under Navy jurisdiction for use as target areas (RSZ A).</p> <p>2) Similar to A, above: approach areas (RSZ B and C) would be managed cooperatively under right-of-way and cooperative agreement.</p>	<p>Accept Alt. E</p>	<p>This alternative satisfies the current needs of the Navy while assuring public access to appropriate areas. It provides protection of cultural and wildlife resources as found in the inventory.</p>
2		<p>The MUC designations made by the CDCA plan were based on the sensitivity of resources and kinds of uses for geographic areas of the desert. Currently, agricultural uses are not allowed in MUC C and L. This is because agricultural use (other than livestock grazing) clearly is not in</p>	<p>Accept Alt. A</p>	<p>Amendment accepted for reasons given in proponent's application</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
3	Alternative B: Reject amendment (no action).	conformance with the objectives of those classes. However, intensive agricultural use is not necessarily consistent with the goals of MUC M and I, either. Class I lands have been established for use as ORV open areas and for large-scale mineral extraction activities. MUC M, while allowing a variety of uses, also requires BLM to "conserve desert resources." This amendment recognizes that inconsistency and prohibits intensive agriculture in those classes.		
	Multiple Use Class Guidelines-Communication Sites	Intensive agriculture would not be precluded from public lands, however. Agricultural development would still be allowed in the CDCA's 300,000 unclassified acres through exchange or through Desert Land Entries (DLE).		
	Alternative A: Change the MUC Guidelines on communication sites. For long distance line-of-sight systems of three or more sites, require a 30-day public comment period on environmental assessments. Alternative B: Reject amendment (no action)	Trans-desert communication networks, unlike most single communications sites, are major actions of potential public concern warranting a 30-day public review period.	Accept Alt. A	Amendment accepted for reasons given in proponent's proposal.
4	Multiple Use Class Guidelines - Waste Disposal Alternative A: Change MUC Guidelines for Waste Disposal in MUC M and I to read: "Public lands managed by BLM may not be used for waste disposal (either hazardous or	In order to reduce the Bureau's liability for enforcement or clean-up of any health or environmental problems related to a solid waste facility on public lands, lands suitable for sanitary landfills should be sold or exchanged	Accept Alt. A	Same as above

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
5	non-hazardous). Where locations suitable for disposal are found on BLM-managed lands, consideration will be given to transfer of such sites through sale or exchange to other ownership."	rather than leased through the R&PP act.		
	<u>Alternative B: Reject amendment (no action)</u>			
	<u>Correct Multiple Use Class Guidelines On Transmission Facilities</u>			
	<u>Alternative A: Correct MUC Guidelines for transmissions facilities in MUC L, M, and I to state: "New gas, electric, and water transmission facilities and cables for interstate communications may be allowed only within designated corridors".</u>	The guidelines presently state that "transdesert communication facilities may be allowed only within designated corridors." The wording is confusing, because the communications facilities referred to in the Energy Production and Utility Corridors Element (p. 115) are "coaxial cables for interstate communications," not line-of-sight microwave systems, which frequently cannot be located within utility corridors.	Accept Alt. A	Amendment accepted for reasons given in proponent's proposal.
6	<u>Alternative B: Reject amendment (no action)</u>			
	<u>Restatement of Goals for Plan Elements</u>			
	<u>Alternative A: Revise the goals set forth in the Plan Elements in Chapter Three of the California Desert Plan. These revised goals can be found in Appendix D.</u>	This Plan modification is in response to the findings and recommendations in the recently completed report entitled "California Desert Conservation Area Progress, 1980-1984." The goals outlined in Chapter 3 of the Desert Plan were found, in many instances, to be too vague to measure the effectiveness of the District's management of the Desert. The report recommended that the goal statements be rewritten to reduce	Accept Alt. A	Same as above

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
7	<p>Alternative B: Reject amendment (no action)</p> <p>MULTIPLE USE-CLASS CHANGES</p> <p>Change Multiple Use Classes in Baker Area and Adjust Boundary of EMNSA</p> <p>Alternative A: Adjust boundary of unclassified area at Baker to include entire Community Service District by changing 431 acres of MUC M land to unclassified. Adjust boundary of the East Mojave National Scenic Area (EMNSA) to coincide with southern and eastern boundary of amendment area as shown on map in Appendix A.</p> <p>Alternative B: Change the unclassified and MUC M land within the amendment area and south of I-15 to MUC L and leave EMNSA boundary at I-15.</p> <p>Alternative C: Change the unclassified land within the amendment area and south of I-15 to MUC M with the intention of not disposing of it. Leave the EMNSA boundary at I-15.</p>	<p>redundancy and vagueness and that the goals be achievable and measurable. The intent would be to improve clarity and consistency without changing the intent or purpose of the resource element.</p> <p>When multiple use classes were assigned during the preparation of the Desert Plan, not all of the Baker CSD was placed in unclassified status. The boundary of the EMNSA was drawn along I-15, rather than along the boundary of the CSD. As a result, the CSD contains MUC M lands which should be changed to unclassified to reflect the Bureau's intent to dispose of these lands. In addition, the EMNSA boundary encompasses a portion of the Baker CSD which should be available for future community development.</p> <p>Retention of public lands within the EMNSA is necessary to the integrity of the area. The boundary of the EMNSA should not be changed.</p> <p>Classification of these lands as MUC M would be in conformance with the surrounding lands, but a commitment to retain the lands in public ownership would be necessary, since the Desert Plan allows the sale of MUC M lands.</p>	Accept Alt. D	<p>To date, all growth in Baker has occurred north of I-15, where a large amount of undeveloped private lands and unclassified public lands subject to disposal are available for development. At present, and into the foreseeable future, there seems no need or demand to change the status of public lands south of I-15, particularly since the public lands most suitable for development are already unclassified.</p> <p>The other issue addressed by this amendment involves a perceived conflict between Scenic Area management and community development in Baker and can be resolved without a plan amendment. The Scenic Area boundary was drawn originally along I-15, in conformance with a policy of adapting land use boundaries to recognizable,</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	<p><u>Alternative D:</u> No action</p> <p><u>Alternative E:</u> Change the unclassified land within the amendment area and south of I-15 to MUC M, and adjust the boundary of the EMNSA to coincide with the boundary of the amendment area.</p>	<p>This would remove the threat of interference by the Bureau with the development of private lands in the amendment area (south of I-15), while assuring that public lands would be retained in Federal ownership.</p>		<p>man-made features (CDCA Plan, p.6). The Scenic Area designation does not apply to private lands, nor does it, by itself, change land use. That is controlled by the already existing multiple use classes and activity planning decisions.</p> <p>The management plan now being prepared for the Scenic Area will outline steps to be taken throughout the East Mojave to deal with any potential management conflicts and will prepare specific action items, including cooperative agreements with private land owners. The Bureau also has the option of including scenic easements in titles to public lands being sold or exchanged. If experience shows that these measures are not effective in resolving conflicts, or if situations develop that require a boundary change, the plan review amendment process can be used to look at the issue again.</p>
8	<p><u>Coachella Valley Fringe-Toed Lizard Habitat</u></p> <p><u>Alternative A:</u> Reclassify Sec. 10, T 4S, R 6E, which is within the designated critical habitat for the endangered Coachella Valley fringe-toed lizard (CVFTL), from unclassified to MUC L.</p>	<p>This would impose land use guidelines which are more consistent with BLM's commitment to long-term management of the land for the benefit of the CVFTL. MUC L would also be consistent with the current land use of adjacent areas to the east which are presently MUC L.</p>	Accept Alt. A	<p>Amendment accepted for reasons given in proponent's application.</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
9	<p><u>Alternative B: Reject amendment (no action)</u></p> <p><u>Coachella Valley Fringe-toed Lizard Habitat</u></p> <p><u>Alternative A: Reclassify public lands, including newly-acquired lands, within the area of the Coachella Valley Fringe-toed Lizard Conservation Plan from unclassified to MUC L.</u></p> <p><u>Alternative B: Reject amendment (no action)</u></p>	<p>This would reflect BLM's commitment to upholding the provisions of the Habitat Conservation Plan and would represent more appropriate land use guidelines for the same reasons given in the preceding amendment proposal.</p>	Accept Alt. A	Amendment accepted for reasons given in proponent's proposal.
10	<p><u>Reclassify Panamint Range</u></p> <p><u>Alternative A: Reclassify that portion of the Panamint Range within Planning Unit 25 and not included in a Wilderness Study Area from MUC L to MUC M.</u></p> <p><u>Alternative B: Reject Amendment (no action)</u></p>	<p>" During and after the inventory phase, the mineral study of the Panamints was rather neglected compared to other subjects within the area. There is new data available which should be considered. The delay in processing Plans of Operations which are required for MUC L causes loss of valuable time for a mine operator and a financial burden."</p>	Accept Alt. B	Mineral data was carefully assessed during Desert Plan preparation. It was because of their high mineral values that the WSAs in this region were recommended as non-suitable for wilderness designation. Because of the presence of other sensitive natural resources, they were placed in MUC L, and our continuing observations here show that this is still the appropriate classification. Some of the proponent's interests lie within WSAs. A change in MUC would be premature and ineffective, since the Interim Management Policy will be in effect until Congress acts.
11	<p><u>Johnson Valley Open Area</u></p> <p><u>Alternative A: Change the strip of land immediately outside the southern boundary of Johnson Valley Open Area and north of the unclassified area from MUC I to MUC M.</u></p>	<p>The southern boundary of the Johnson Valley Open Area has been adjusted by the BLM, through plan clarification, to be consistent with topographic features and to recognize existing private land and residential patterns. There is now a zone of Class I lands outside the Open Area which is</p>	Accept Alt. A	Amendment accepted for reasons given in proponents application.

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
12	<p><u>Alternative B: Reject Amendment (no action)</u></p> <p><u>Small Tract Area South of Johnson Valley</u></p> <p><u>Alternative A: Adjust the MUC L boundary at the south edge of the Johnson Valley small tract area so that portions of Sections 20 and 21 T 3N, R 4E are changed from MUC L to unclassified.</u></p> <p><u>Alternative B: Reject Amendment (no action)</u></p> <p><u>AREAS OF CRITICAL ENVIRONMENTAL CONCERN AND SPECIAL AREAS</u></p> <p><u>Refine original boundaries of four ACECs. These changes are the result of extensive inventory conducted before or during preparation of activity plans for each ACEC.</u></p> <p><u>Clark Mountain ACEC (No. 19)</u></p> <p><u>Alternative A: Adjust boundary to include approximately 3,000 acres of sensitive plant habitat along northern edge and 1,270 acres of archaeological sites at the Ivanpah townsite. Delete 600 acres of marginal wildlife habitat along the south and west boundaries.</u></p>	<p>closed to ORV use. This is inconsistent with the Desert Plan which has MUC I lands either as open or as mineral extraction areas. A more proper designation would be MUC M rather than MUC I or unclassified, which implies disposal.</p> <p>The area is flat and interspersed with private land (small tract parcels). The change would acknowledge the existing private land and the intention to sell the remaining portions of public land.</p> <p>The final Clark Mountain Management Plan recommended the above boundary adjustment to provide a more manageable boundary and to incorporate areas with significant resources. The draft plan had also recommended the inclusion of an additional 6,740 acres to the northeast that would protect sensitive plant habitat. It has since been dis-</p>	<p>Accept Alt. A</p> <p>Accept</p>	<p>Amendment accepted for reasons given in proponent's proposal.</p> <p>Same as above</p>
13				
13a				

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
13b	<p><u>Alternative B: Reject Amendment (no action)</u></p> <p><u>Yuha Basin ACEC (No. 64)</u></p> <p><u>Alternative A: Revise the boundary to include the entire area south of Interstate 8 covered by the Yuha Desert Management Plan.</u></p>	<p>covered that these plants are more common than originally known, and that they do not require management as an ACEC.</p> <p>The original ACEC was nominated to protect significant wildlife and cultural resource values. Monitoring of the region revealed that important habitat for the flat-tailed horned lizard was excluded from the original boundary along with several cultural resource areas. These areas should be added.</p>	Accept Alt. A	Amendment accepted for reasons given in proponent's proposal.
13c	<p><u>Alternative B: Reject Amendment (no action)</u></p> <p><u>Gold Basin/Rand Intaglio ACEC (No. 67)</u></p> <p><u>Alternative A: Relocate boundary to correspond with the distribution of resources.</u></p>	<p>The original boundary included only a small portion of the geoglyphs present in the area. Recent cultural resources Class III inventory has revealed that the ground figures actually lie south and west of the designated area. This amendment will rectify this mapping error.</p>	Accept Alt. A	Same as above
13d	<p><u>Alternative B: Reject Amendment (no action)</u></p> <p><u>Plank Road ACEC (No. 72)</u></p> <p><u>Alternative A: Adjust boundary to correspond to a 200 foot-wide strip along the entire length of the existing Plank Road route.</u></p> <p><u>Alternative B: Reject amendment (no action)</u></p>	<p>The existing ACEC contains only the small portion of the original route adjacent to Gray's Well. Remnants of the Plank Road are visible intermittently along the route. ACEC stature should be ascribed to the entire length to ensure management consistency.</p>	Accept Alt. A	Same as above

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
14	<p><u>Warm Sulfur Springs</u></p> <p><u>Alternative A:</u> Establish an ACEC at Warm Sulfur Springs.</p> <p><u>Alternative B:</u> Reject amendment (no action).</p>	<p>Warm Sulfur Springs is a desert marsh in Panamint Valley having considerable importance to wildlife. The marsh provides habitat for waterfowl, wading birds, amphibians, and other species. The area requires site-specific management prescriptions. ACEC designation will accomplish this and preclude adverse impacts.</p>	Accept Alt. A	Amendment accepted for reasons given in proponent's proposal.
15	<p>Change the unclassified lands in the East Mojave National Scenic Area to Class L (except in the Baker vicinity, which is considered in Amendment 7).</p> <p><u>Alternative A:</u> Change all unclassified land to Class L. (15,360 Ac - Map, Appendix A)</p> <p><u>Alternative B:</u> Reclassify only the larger contiguous parcels of unclassified lands to Class L. (10,920 Ac).</p> <p><u>Alternative C:</u> Reject amendment (no action).</p> <p>VEHICLE ACCESS</p> <p>Revise the ORV designations for <u>Cadiz Dunes</u></p>	<p>" Retention of public lands within the EMNSA is necessary to the integrity of the area. BLM should do the planning for the EMNSA, not the County of San Bernardino Planning Dept. "</p> <p>Many of the small parcels which are excluded contain 160 acres or less and are surrounded on three or four sides by private land. These lands should remain unclassified and be available for sale or exchange for private lands in more significant regions.</p>	Accept Alt. B	<p>This alternative would place about two-thirds of the unclassified lands in the EMNSA in the more protective MUC L designation, indicating the Bureau's intent to not dispose of the land. The isolated smaller parcels (4,440 Ac) are not manageable and would remain unclassified. They would be used as an exchange base for consolidating large blocks of public land.</p>
16	<p><u>Alternative A:</u> Designate 5,760 Ac closed and 32,000 Ac open; change MUC designation from Class L to Class I in open area.</p>	<p>Although the lower Cadiz Valley was once designated open under the 1973 ICMP program, it was not considered for cross country ORV use by the Desert Plan. Continued population growth in the Yucca Valley/Joshua Tree</p>	Accept Alt. A	<p>This alternative would provide the best variation in potential recreational uses. Closure of the highest and most scenic portion of the dunes would be</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	<p><u>Alternative B:</u> Designate 37,760 acres open. Change MUC designation from Class L to Class I in open area.</p> <p><u>Alternative C:</u> Designate 37,760 acres closed; entire area would remain MUC L.</p> <p><u>Alternative D:</u> No action; 9,280 acres would continue to be closed, with the remainder limited to "existing routes of travel."</p> <p>LIVESTOCK GRAZING</p> <p><u>Colton Hills Grazing Allotment</u></p> <p><u>Alternative A:</u> Delete the area south of I-40.</p> <p><u>Alternative B:</u> Delete the area south of I-40 and west of the Essex Road.</p> <p><u>Alternative C:</u> Reject amendment (no action)</p>	<p>corridor, recent changes in available ORV areas, a significant increase in ORV numbers and use, and the demonstrated unpopularity of the nearby Rice Dunes are factors that were either unknown or not available for consideration during preparation of the Desert Plan.</p> <p>"According to the Desert Plan, cattle should not be allowed in the bighorn range south of I-40. The portion of the allotment south of I-40 is very small and provides for only limited cattle use. Recent evidence indicates that diseases commonly associated with livestock are important factors in the decline of bighorn sheep populations."</p>	<p>Accept Alt. A</p>	<p>continued. The open area south of this would be large enough and sufficiently varied in terrain to provide a quality experience for dune buggy, ATV, and ORV users. The boundary between open and closed areas would be easily identifiable and more easily managed than the existing boundary.</p> <p>This alternative would provide the greatest protection for bighorn sheep, in response to concerns of the public, as represented by the Desert District Advisory Council. Although only inconclusive evidence exists that cattle in this allotment carry livestock-related diseases to bighorn sheep in the Clipper Mountains, elimination of grazing south of Interstate-40 would ensure that this potential problem will not occur.</p> <p>Separating bighorn in the Clippers from livestock would also be beneficial for research being conducted by the Department of Fish and Game on the effect of grazing on the health and viability of bighorn herds in this region.</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
18	<p>WILD HORSE AND BURROS</p> <p><u>Herd Management Areas</u></p> <p><u>Alternative A:</u> Reduce wild horse and burro populations to zero in the Morongo and Coyote Canyon HMAs.</p> <p><u>Alternative B:</u> Reject amendment (no action)</p> <p><u>Cima Dome Herd Management Area</u></p> <p><u>Alternative A:</u> Reduce burro population to zero in the Cima Dome HMA</p> <p><u>Alternative B:</u> Reject amendment (no action)</p>	<p>Retention and management of burros on public land in the Morongo area is infeasible due to the very small herd numbers and the high percentage (35%) of intermingled lands.</p> <p>The Coyote Canyon herd of about 20 horses is scheduled for removal by the Santa Rose Habitat Management Plan for protection of bighorn sheep.</p> <p>" Burros have migrated to this area (White Rock pasture area and Thomas pasture area of Kessler Springs grazing allotment) since the implementation of the Desert Plan. Prior to this time, there were no burros in either of these two sections of the allotment, and there should not be any there now. "</p>	<p>Accept Alt. A</p> <p>Accept Alt. A</p> <p>Reject Alt. B</p>	<p>Although there would be a minor inconvenience for the operator due to inaccessibility of early forage south of I-40, the available AUMs would not be affected, and the economic impact would be minimal.</p> <p>Amendment accepted for reasons given in proponents' application.</p> <p>Same as above</p> <p>The Cima Dome Herd Management Area was established in 1980 with the approval of the California Desert Plan. Management levels were set at 55 burros based on carrying capacity and determination that the environmental impact of the level would be acceptable. No new information has been found which indicates this herd level is inappropriate, or that number are in excess of that level. Monitoring has not been completed which would indicate a deteriorating resource base. Until information is available to indicate otherwise, the appropriate management level of 55 animals will be maintained, excess animals being removed as funds are available.</p>

TABLE 1-1 - DESCRIPTION OF AMENDMENTS

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
20	<p>EASTERN SAN DIEGO COUNTY</p> <p><u>Modify the Eastern San Diego County Planning Unit MFP</u></p> <p><u>Alternative A:</u> Include all newly acquired lands in T 16S, R 7E, Sec. 16 & 20, totalling 595 acres. This land was acquired in case C-15726 on 10/15-84 from the Trust for Public Lands. Designate these lands MUC L.</p> <p><u>Alternative B:</u> Reject amendment (no action)</p>	<p>The newly-acquired lands were not studied in preparation of the MFP for the Eastern San Diego County Planning Unit. In order to be properly managed, they need to be included in the land use plan for that area. The newly obtained acreage is similar to the surrounding public land in appearance and use. The area consists of rolling topography covered with chaparral and enriched desert shrubs. Historically, the primary uses have been for grazing and hunting. Because this land cannot be separated from the surrounding region, it should receive the same management. Since the parcels are small and surrounded by MUC L lands, they would also be designated MUC L.</p>	Accept Alt. A	Amendment accepted for reasons given in proponents application.

CHAPTER II

SUMMARY OF PUBLIC COMMENTS

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SUMMARY OF PUBLIC COMMENTS

CHARACTERISTICS OF THE RESPONSE

The Draft Environmental Impact Statement (DEIS) on the 1985 Amendments to the California Desert Plan was released for public review on March 7, 1986. The comment period extended to June 6, 1986. A total of 143 responses were received during this period. Public hearings were not held, but the opportunity for oral comment was provided at the meeting of the California Desert District Advisory Council on April 10, 1986 in Riverside.

Most of the response (97%) this year came from California residents. Input from respondents living within the CDCA was higher than usual (26%), as was that from residents of the area south of the Tehachapi Mountains (60%). The proportion from Northern California fell to 11%, compared to 37% in 1982 and 28% in 1983.

TABLE 2-1

GEOGRAPHIC ORIGIN OF RESPONSES

<u>Origin</u>	<u>Responses</u>	
CDCA	37	(25.8%)
Non-CDCA Southern California	86	(60.2%)
Non-CDCA Northern California	15	(10.5%)
Nevada, Arizona	3	(2.1%)
All Others	2	(1.4%)
Total	143	(100%)

As usual, most of the comments (75%) were submitted by individuals. Organizations provided 11% of the Response. Two-thirds of these groups were conservation-oriented, four were off-road vehicle recreationists, and one was a gem and mineral club. Three businesses and four utility companies also responded. The remainder of the comments were from local, state, and federal agencies (see Table 2-2).

TABLE 2-2

TYPE OF RESPONDENT

<u>Respondent Type</u>	<u>Responses</u>	
Individuals	107	(74.8%)
Organizations	15	(10.5%)
Government	14	(9.8%)
Business	3	(2.1%)
Utilities	4	(2.8%)
Total	143	(100%)

GENERAL OVERVIEW

Unlike earlier amendment reviews, the comments this year focused on individual amendments instead of emotional statements on the protection or use of desert resources or on the Bureau's effectiveness in handling resource problems. Respondents generally favored protection of wildlife, scenic vistas, and special areas; a few spoke out for unlimited vehicle access to favorite recreation spots. A few respondents listed "yes" and "no" votes on all of the amendments, but the majority limited their comments to no more than ten different amendments.

Comments on the adequacy of the Draft Environmental Impact Statement were relatively few. These focused on Amendment One and will be responded to in Chapter 3.

SUMMARY OF GENERAL COMMENTS

The majority of respondents agreed with the proposals for removal of feral burros and protection of the Coachella Valley Fringe-Toed Lizard. There was some concern about the effect of livestock on the desert bighorn. Assurance was wanted that there would be adequate environmental review and public input on such projects as new microwave towers or the exchange or sale of public land for waste disposal sites. Off-road vehicle recreationists wanted to maintain access to favorite recreation spots, while conservationists feared the effects of vehicles on sensitive wildlife, plants, and cultural resources. There was general agreement among conservationists and vehicle recreationists that it would be very difficult to manage a sand dune that was partly open and partly closed. Specific input on each plan amendment will be reviewed in the next section.

SUMMARY OF COMMENTS BY AMENDMENT

Amendment 1. BLM, Navy, BuRec Cooperative Agreement

This proposal was commented on by one-quarter of the respondents. Many of the responses were lengthy and dealt with several aspects of the proposal. Protection of sensitive resources was the emphasis of the great majority of the letters; the most frequently mentioned concerns were protection of wildlife, particularly the flat-tailed horned lizard, cultural resources, and vegetation. Other less frequently mentioned concerns were potential effects of ORV activities on the San Sebastian Marsh ACEC and effects of the project on adjacent wilderness study areas.

Off-road vehicle organizations were unhappy about the closure of Imler Road, and popular long-used route of travel in this area, and about the potential loss of access to popular ORV play areas. A gem and mineral group wanted assurance that they would not lose access to favorite rockhounding sites. Local utility and governmental agencies expressed concern over possible effects of the project on geothermal development, utility corridors, and access to irrigation canals.

Only one respondent recommended acceptance of Alternative A, the original proposed action. Two organizations representing ORV recreationists favored Alternative C and expressed disappointment that Alternative A did not maintain the "status quo" for vehicle activities. Six respondents preferred Alternative D, minimum use, because of its greater protection of cultural and biological resources. The most popular choice (9 respondents) was rejection of the entire project (Alternative B) for the reason that the DEIS was inadequate in not giving more information about present and future operations of the Navy within the project area.

Specific comments on the above issues will be responded to in Chapter 3.

Amendment 2. Agricultural Uses

Less than a dozen respondents mentioned this proposal. All favored Alternative A except one who wanted to eliminate agriculture on all public lands, on the basis that it is an exclusive use and not consistent with multiple use objectives.

Amendment 3. Communication Sites

The number of comments on this proposal was relatively small. Several respondents spoke favorably about increasing the opportunity for public participation. One writer stated that even single communication sites are major actions and should be subject to public review. An agency requested the opportunity for review on any projects which might affect federally-listed species. Representative comments were:

- I support----the trans-desert line-of-sight microwave towers do need to be controlled to preserve the view shed. The greedy ones have to be controlled.
- We support Alternative A on plan amendment 3. The 30 day public comment period for communication sites is desirable so that the public can have input into potential scenic pollution.

Amendment 4. Waste Disposal Guidelines

All comments on this proposal favored prohibiting waste disposal sites on public lands. Two respondents mentioned particular areas in which they wanted no waste disposal on either public or private land. Three commenters noted that new sites should not be disposed of by the BLM until environmental review involving public input was completed.

Representative comments were:

- I support this amendment if BLM adds the following to the MUC Guidelines text: "Such consideration shall entail development of an environmental review process involving public comment, pursuant to the National Environmental Policy act."

- We support Alternative A on plan amendment 4. There should be no waste disposal sites on BLM lands. There should be no waste disposal sites in EMNSA on either private or public land.
- BLM as an existing manager, owner of such sites will not be absolved of its legal responsibility just by "disposing" of existing sites. For new sites, BLM should not be authorized to dispose of proposed sites until all of the necessary environmental documents have been prepared. Analysis of these documents should precede the BLM decision to transfer, sell, exchange or retain. With the understanding that retention is an option, and that BLM has the responsibility of a decision as to the suitability of the land to serve as a waste disposal site before selling or exchanging, we support this amendment.
- I agree with the proponent with the provision that there will be a public comment period if any lands suitable for such a facility is found within the CDCA.

Amendment 5. Transmission Facilities Guidelines

This proposal was approved without additional comment by a small number of respondents.

Amendment 6. Restatement of Desert Plan Goals

This amendment elicited only a few responses, the majority of which approved it without comment. One respondent approved the intent of the goals but questioned their measurability. Two respondents stated that the revised goals contain policy changes which have not been subject to environmental analysis. Responses to these comments are given in Chapter 3.

Amendment 7. "Unclassified" at Baker; EMNSA Boundary

This proposal received the most letters of all the amendments - approximately 80% of the total. The vast majority opposed the preferred alternative and recommended Alternative B instead. The business interests of Baker preferred Alternative A, since it would change public lands within the Community Service district (CSD) to unclassified status, indicating the BLM's intent for disposal.

The following reasons were given by opponents of the amendment. (1) The boundary of the East Mojave National Scenic Area (EMNSA) should remain at Interstate-15 which is far more easily definable and manageable than the boundary of the Community Service District. (2) The sale of 410 acres at the gateway of the EMNSA and potential development and billboards south of I-15 would desecrate the view from the freeway. (3) The BLM must stop chopping away at the EMNSA. Typical comments are shown below.

- The Bureau's preferred recommendation is not warranted as there is only one occupied building south of I-15 and extremely limited infrastructure. The Baker Community Service District boundary is one that

is less perceived than the physical boundary which I-15 presents. BLM would administratively find the use of the I-15 boundary less expensive to manage than the preferred alternative.

- I oppose BLM's preferred alternative in Plan Amendment 7 and instead support Alternative B. The integrity of the East Mojave National Scenic Area with manageable boundaries is paramount, and I-15 is a definite boundary to the public and the only one manageable by BLM. This Scenic Area is a more important designation than Baker CSD south of I-15.
- I wish to inform you of my support for Plan Amendment 7 Alternative B to retain the existing boundary of the East Mojave Scenic Area. I have been in this area and feel that the sale of the 410 acres which are an entry to this area (across from Baker) would encroach upon and encourage further desecration as well as destroy a beautiful view from the freeway with possible billboards in the future. Please keep the East Mojave Scenic Area boundaries as they are.

Amendment 8. Coachella Valley Fringe Toed Lizard Habitat

This amendment received a moderate amount of response, all of it favorable. Respondents favored reclassifying lands in the critical habitat of the Coachella Valley fringe-toed lizard as Class L, in order to help protect the species. Representative comments are given below.

- I fully endorse acceptance of this amendment. Section 10 is an integral component of the established Coachella Valley Preserve. Its retention and protection by BLM is consistent with protection of the federally-listed Coachella Valley fringe-toed lizard (Uma inornata).
- Classifying land as "Class L" in Coachella Valley fringe-toed lizard habitat helps to protect this endangered species. Attention should be given to the use of adjacent lands as well.
- Specifically, we support the recommendations to accept proposed amendments 8 and 9 which would classify lands that are critical habitat for the Coachella Valley fringe-toed lizard as Class L. These amendments will help protect that species which is federally listed, and are consistent with the Bureau's affirmative responsibilities under the Endangered Species Act.

Amendment 9. Coachella Valley Fringe-Toed Lizard Habitat

The number and type of comments to this proposal were very similar to those for Amendment 8.

Amendment 10. Panamint Mountains

This proposal aroused a moderate amount of public comment, almost all of which favored the BLM decision to disapprove. Commenters felt that a classification

of "limited use" is appropriate for supporting the sensitive natural resources of this area. The one dissenter spoke against closing access to these lands. Some of the comments are shown below.

- We also support the recommendation to reject amendment 10, which would reclassify the Panamint Mountains as Class M because of their mineral values. At the same time, however, we must question the Bureau's decision even to entertain this amendment, since it is obvious that it does not satisfy the criteria that have been established for use in determining which proposals should be considered.
- I support the "rejection" of the Amendment. Panamint Range does not need to be reclassified. Sensitive natural resources, riparian, wildlife are very important for the welfare of all now and into the future.
- We highly commend the BLM for again rejecting efforts to reclassify the Panamint Mountains as class M for mineral values.
- I agree with BLM's reason for rejection and I commend the BLM for standing up to this mine operator.
- Approve Alternative A. Having recently visited this area I was disturbed at limiting signs posted unnecessarily. It saddened my trip.

Amendment 11. Johnson Valley Open Area

Only a few comments were received on this amendment. All were favorable to the multiple-use class change. One mentioned that the Creosote Rings ACEC has long needed a buffer zone to protect it from ORVs. Another stated that degradation of vegetative resources is due to inadequate law enforcement personnel presence, signing, fencing, or other protective measures.

Amendment 12. Johnson Valley Small Tract Area

This proposal was approved by the few respondents who mentioned it. One respondent noted the historical importance of homesteading in this area and the appropriateness of increasing private ownership here.

Amendment 13a. Clark Mountain ACEC

The adjustment in boundaries of this ACEC was commented on by a moderate number of respondents. A large majority approved the expansion which would provide protection for plant and archaeological resources. Two respondents expressed concern about adjacent utility corridors.

Amendment 13b. Yuha Basin ACEC

Only a small number of respondents mentioned this proposal. All were in favor

of the revised ACEC boundary. One respondent mentioned three botanical resources which were felt to be in substantial danger of damage from off-road vehicles.

Amendment 13c. Gold Basin, Rand Intaglio ACEC

Less than a dozen respondents commented on this proposal. All approved the relocation of the ACEC.

Amendment 13d. Plank road ACEC

The same individuals who commented on the preceding two proposals responded in favor of this change.

Amendment 14. Warm Sulfur Springs ACEC

A moderate number of responses were received on this proposal. All favored establishment of a new ACEC at Warm Sulfur Springs. Representative comments are shown below.

- We support the designation of Warm Sulfur Springs as an Area of Critical Environmental Concern. We also suggest that surveys for endemic species be undertaken soon by the BLM.
- Negative impacts in the Panamint Valley continue to mount with increased use. The proposed ACEC will improve protection for sensitive resources in this important area.
- "Establish a new ACEC at Warm Sulfur Springs in Panamint Valley....," is worthy of consideration as an ACEC. This area is one of the most important wetland areas in the Panamint, Searles Valley drainage basin.

Amendment 15. EMNSA "Unclassified" Lands

A moderately large response was received to this proposal. Approximately three-fourths of the respondents requested approval of Alternative A - changing all unclassified lands to Class L. The rest of the comments were divided between Alternatives B and C.

The majority stated that reclassification of scattered parcels within the EMNSA to a more protective land classification would be the best solution. They feared that lands which had been disposed of would be subject to uses which could present management problems. Proponents of Alternative B, the Bureau's preferred alternative, gave no rationale for their opinion. One respondent who favored Alternative C stated that there is already plenty of restricted land in the EMNSA, and the ability for public development should be left intact for future generations.

Representative comments are given below.

- We support an extended Alternative A. Lands which are disposed of may present acute management problems within the Scenic Area. We already have evidence of attempts to cite new small developments within the EMNSA.
- Land management planning is particularly difficult in areas where scattered parcels of private land are surrounded by public lands possessing unusual resource values, such as the EMNSA. Reclassification of all unclassified lands in this important region to Class L seems the most logical alternative. Although leaving small parcels of land unclassified for the purpose of trading for more sensitive areas sounds laudable, there is no guarantee that such opportunities will arise. The best approach in this instance would be to provide protection for the maximum amount of acreage. If requirements change in the future, new plan actions may be undertaken at that time.
- Finally, we would like to express qualified support for the recommendation to accept Alternative B to amendment 15. This amendment proposes that certain unclassified lands in the East Mojave national Scenic Area be classified as Class L and retained. However, the recommended alternative is limited to large land parcels. Because several key parcels would still remain unclassified and available for disposal, we urge acceptance of alternative A, which would retain all presently unclassified parcels in the Scenic Area.
- APPROVE ALTERNATIVE C Limiting the use of these unclassified lands now would be short sighted. In the future the potential of these parcels cannot be predicted. There is plenty of restricted acreage within the EMNSA now. The ability for public development should be left intact for future generations. The county's general plan designations are restrictive enough of development. Save this area for the future multi use.

Amendment 16. Cadiz Dunes

This amendment received the second largest response, approximately 30 percent of total respondents. A large majority favored total closure of the dunes (Alternative C). The major reason was the difficulty of managing a "split" dune system. The following are representative comments.

- The boundaries as defined in the Plan Amendment would be unmanageable. No experiment that we have seen to separate Open and Closed areas without a clearly defined road between them has worked. The use would undoubtedly spill well past the proposed Open area to adjacent areas with sensitive resources.
- Trying to manage part of a dune system as open and part as closed to vehicular traffic creates a very difficult management situation, one that usually results in the entire area being effectively open. The South Algodones Dunes is a good example. We support alternative C - keep the area closed.

- I support Alternative C. KEEP THE DUNE SYSTEM CLOSED TO ORVs. How much biota will be sacrificed for a short term "fun" - whatever that is. Human senses will never be satisfied.
- The limited law enforcement personnel available to the BLM would preclude any effective seasonal closure of the dunes.
- The area in question, although well over 5000 acres, was erroneously eliminated as a wilderness study area when it was separated from the rest of the Sheephole, Cadiz WSA by a supposed "road." The wilderness values have been recognized by having a portion of the area included as Wilderness in Senator Cranston's California Desert Protection Act of 1986, S2061.

The few letters which agreed with the Bureau's preferred alternative (Alternative A) either gave no rationale or supported opening the dunes to "desert enthusiasts."

The proponents of Alternative B, which would open all of the dunes gave several arguments why opening the entire dunes would be more protective than opening just a portion. One long-time desert resident deplored the closing of areas which were once open to vehicle use. Some of these comments are responded to in Chapter 3.

Amendment 17. Colton Hills Grazing Allotment

Almost a dozen respondents commented on this proposal. The ratio of proponents to opponents was about two to one. The major concern of proponents was protection of bighorn sheep from diseases carried by domestic livestock. Typical comments were:

- Indeed, we are greatly concerned that livestock grazing in the Clipper Mountains appears to be harming the resident bighorn herd. We do not share BLM's distinction between the Old Woman and Chemehuevi mountain ranges and the Clipper Mountains. We believe that the current restriction was intended to protect all bighorn populations south of I-40. Again, we support and urge BLM to adopt Alternative A to delete this area from livestock grazing.
- The Colton Hills grazing allotment should be deleted in the area south of Interstate 40 and west of Essex Road to protect the bighorn sheep of the Clipper Mountains who should be as worthy of protection as the sheep on the Old Woman (?) Mountains et. al. mentioned in your explanation. "Historic" use for grazing doesn't justify literally sentencing the Clipper Mtn. herd to eventual attrition and possible extirpation. Historic shouldn't be its own raison d'etre. If it was, the CDCA would never have been created in the first place.
- Finally, since rejection of this amendment is likely to harm bighorns, see Cf., EIS, p. 3-43, acceptance of this recommendation would conflict with the Bureau's policy on sensitive species and the goal of the Desert Plan that was discussed above.

The respondents who opposed the amendment simply agreed with the Bureau's preferred alternative but gave no reasons.

Amendment 18. Wild Horses and Burros

This amendment received a moderate amount of comment. The proposal to remove wild horses and burros from the Morongo Valley and Coyote Canyon Herd Management Areas (HMA's) was approved by almost all of the respondents. One person disagreed, stating that removing the 5-10 burros from Morongo Valley was a waste of tax payers money. On the other hand, the staff of Joshua Tree National Monument said that this action would prevent burros from wandering into the monument in search of a water source and then establishing a feral burro herd.

Amendment 19. Wild Burros in Cima Dome Area

Response was similar to that for Amendment 18 except that it was entirely in favor of burro removal.

Amendment 20. Eastern San Diego County MFP

Few respondents mentioned this amendment. Those who did simply stated that they agreed with the Bureau's preferred alternative.

COMMENTERS

GOVERNMENT

Federal

USDI, Bureau of Mines
USDI, Bureau of Reclamation, Lower Colorado River Regional Office
USDI, Fish and Wildlife Service, Western Region
USDI, Fish and Wildlife Service, Laguna Niguel Field Office
USDI, National Park Service, Western Region
U.S. Environmental Protection Agency
U.S. Navy, Naval Air Facility, El Centro

State

California Department of Parks and Recreation, Anza Borrego State Park
California Resources Agency
California State Lands Commission

Local

Baker Community Service District
Imperial County Planning Department
Kern County Planning Department
Riverside County Planning Department

ORGANIZATIONS

AMA District 38, San Diego Co. Sports Committee
Audubon Society, Yuma, AZ
California 4WD Clubs, Inc.
California Wilderness Coalition
Citizens for Mojave National Park
Defenders of Wildlife
Desomount Club
Friends of Wildlife
High Desert High Rollers
National Resources Defense Council
San Diego Gem and Mineral Society
San Diego Off-Road Coalition
Sierra Club
Wilderness Society

BUSINESSES

Baker Area Chamber of Commerce
International Technical Corporation

UTILITIES

Imperial Irrigation District
Los Angeles Department of Water and Power
Metropolitan Water District
Pacific Gas and Electric Company

INDIVIDUALS

Gerald Adler
Sybil Adler
Harriett Allen
Scott Anderson
James R. Bagley
Rachel Baretz
Dennis and Mindy Belli
Thomas A. Bliss
A.J. Borrie, III
Laura and Frank Brady
David Bracken
Eiko Bracken
Marlene Bradley
Raquel Brae
Joan W. Brown
R. D. Burns
Catherine Campbell
James Canter
David Cataldo
Daniel Chapman
Marc Clark
Aaron Cohon
W. Czajkowski
Douglas Demers
Michael DiGregorio
Robert Dominick
Judy Eishowitz
Janer Eldridge
Lauren E. Eusey
Robert & Jeanne Foreman
Jim Forsang
Bob Furtek
Roland C. Glass
Jeanne Gotts
Kathleen Gotts
Arlene Gowne
Diane G. Hall
James & Edith Harmon
Bob Hartman
David B. Harvey
Mrs. H.C. Hedgepeth
Carla Hendricks
Mary Ann Henry
Larry Howard
Martin Howard
Eldon Hughes
Horton Johnson
Norman Johnson
Arlene Kallenburger
Jeannie Kalwoda
Daniel & Barbara Kaminski
Stephen A. Kaufman
Albert J. Kelley

Karl A. King
Margaretha Krucker
Christine Kudija
Erica B. Ladenheins
Celia Lamborn
Shirley Leary
Jim Livermore
Chris Lomaka
Susan R. Lundy
Jeffrey P. Lynn
Mark A. Mason
William J. Mautz
Bob & Peggy McDowell
McMurray Family
George P. Meserve, Jr.
Ron Messick
Bill Meyers
Jeanne & Dale Meyers
Cherry Miloe
A.A. Morriss
Marc Moss
Don Myers
Valerie Lynn Nestrick
Miriam Nicholson
Gary L. Null
Marsha Null
Gayle Ostrow
Ted Rado
William M. Raisner
Helen Real
Pat Rovon
Kevin Royle
Harold & Arlene Sanders
Steve Schmid
Martha Schmidt
David Seeley
Jerome Seidner
Florence Shipek
Patrick J. Sibley
Sue Ann Sinay
Dan Stabes
John R. Swanson
Mr., Mrs. Michael Szabo
Donald W. Thompson
Charles Tollard
Mitsuo Tomita, M.D.
Jim Warren
Carol A. Wiley
Betty Williams
Robin K. Wilson
Jacqueline Wolff
Arthur & Jean Worley
Mr., Mrs. Wallace B. Worswick
Vincent Yoder

CHAPTER III

SPECIFIC COMMENTS AND RESPONSES

CHAPTER III

SPECIFIC COMMENTS AND RESPONSES

This chapter presents specific comments made by individuals, organizations and governmental agencies during the EIS public review period and responses to those comments. Many of the comments in the 143 letters received were opinions favoring or opposing particular amendments. These statements were in Chapter 2. The comments presented in Chapter 3 pose specific questions regarding the EIS itself. They are direct excerpts from the original letters rather than summaries.

Table 3-1 lists the comment, the commenter, and the BLM response. Where other commenters raised the same question, they are identified in parentheses. If an EIS textual revision is necessary in response to a comment, that revision is presented in Chapter 4 (Modifications and Corrections).

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
<u>GENERAL COMMENTS</u>		
USDI Bureau of Mines	<p>A review of the subject document was very confusing and frustrating. The report left much to be desired in organization, particularly in section narratives that attempt to explain the contents and how they are to be used. For example, in Chapter 3, Affected Environment, there is no clear statement explaining that all the proposed amendments are <u>not</u> discussed in the chapter, but only those requiring more "in-depth" analysis. Unless the reader catches the phrase in the paragraph of page 3-1, "when necessary", he may wrongly assume omissions exist. It is suggested that all proposed amendments be listed in this discussion part, and those which do <u>not</u> require additional "in-depth" discussion have a simple annotation that "no further discussion is warranted.</p>	<p>The introductory page of Chapter 3 (Affected Environment) has been revised to give more emphasis to the fact that additional discussions are given on only part of the amendments. (See chapter IV p. 4-3)</p>
USDI Bureau of Mines	<p>No table was presented explaining what was meant by the classifications MUC L, MUC I, or MUC M. The first appearance of such an explanation is in a letter of July 3, 1985, included in appendix F of the subject report. This was not very easy to use, and it mentioned these classifications as they relate to the proposed BLM/Navy cooperative agreement.</p>	<p>Multiple Use Classes are defined in the Glossary, p. G-1. A more detailed definition is given in the CDCA Plan. Ready access to a copy of the Plan is helpful when reviewing proposed amendments. We would be glad to send your office more copies if you desire.</p>
USDI Bureau of Mines	<p>Finally, what is very disturbing is that two proposed amendments--Preliminary Amendments 85-P-7 and 8--were dropped for erroneous reasons. The amendment, as outlined in Table C-2 (p. C-4), were dropped because "changes in wilderness suitability recommendations will not be considered until mineral surveys by the USGS and the Bureau of Mines have been completed." According to our records, the mineral studies by the Bureau and the USGS for Little Sandy Spring, WSA 119, were completed well over one year ago. They are Bu-Mines Report 103-83 and USGS Report 84-557, which have been sent to your office. Also, for Saline Valley WSA 117, reports were completed last year. They are BuMines Reports 16-84 and USGS 84-560, also sent to your</p>	<p>The California State Director has determined that there will be no changes in suitability recommendations until mineral information is available for the entire CDCA and until analysis of this data is complete. A change in multiple use class would have no effect until Congress makes its decision on wilderness designation due to the requirements of the Interim Management Policy.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
U.S. Environmental Protection Agency	<p>office. Why has a determination not been made in over a year, based on the above published reports? We feel Intermountain Resources, Inc. deserves a better explanation.</p> <p>Table S-1 "Candidate Amendments - Summary of Impacts" (p. S-3), lists the negative and positive impacts of the proposed amendments. Amendment No. 1, Navy Cooperative Agreement, Alternative A and Amendment No. 16, Cadiz Dunes, MV Access, Alternative A and Alternative B, are noted as having negative impacts to "soil, air, water." In the text of the DEIS there is no discussion of what those impacts are. The basis for the conclusion that negative impacts to soil, air and water would occur should be presented in the FEIS. Mitigation measures should be identified to prevent adverse impacts to these resources.</p>	<p>For Amendment No. 1, the negative impacts were on soils; there were none on water or air. The effects on soils are mentioned in the sections on vegetation. For example, see pages 4-6, 4-8, and 4-25 in the DEIS.</p> <p>For Amendment No. 16, there would be no negative impacts on air or water and only very minor effects on soils. Table S-1 has been corrected, and a section has been added to Chapter IV, p. 4-54 on the effects on soils.</p>
California State Lands Commission	<p>We are currently in a multi-year exchange program with the BLM in the CDCA, the aim of which is to reduce the "inholding" problem to the benefit of both agencies. It is therefore necessary for BLM to identify for acquisition, by exchange, any State parcels, fee or reserved mineral rights, whose value or use will in any way be hampered by reason of the proposed amendments. Further, any acquisition of such lands and the designation of Federal lands for exchange should be given a high priority of BLM staff and budget. The EIS should discuss this matter and should reflect the level of priority which will be applied to eliminate any deleterious effects of such amendments on the State and its land management program.</p>	<p>The multi-year exchange program developed in conjunction with the State Lands Commission is of high priority with the Bureau, as reflected in our yearly work plan. The program is, and will continue to be, initiated by the Commission. Awareness of both State of California and Bureau needs is a significant aspect of the land exchange program.</p>
Jacqueline Wolff	<p>A table of contents for the maps section would be helpful.</p>	<p>We agree. Unfortunately, the table of contents for the maps section was not sent to the printer. It was added separately to each copy before mailing but yours may have fallen out. We apologize to all all who were inconvenienced.</p>
Jacqueline Wolff	<p>On page 4-68, shouldn't the sentence read "in the Baker area", and not in the Barstow...</p>	<p>Text revised. See correction for page 4-68.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
USDI, Bureau of Reclamation	<p><u>AMENDMENT 1</u></p> <p>The subject Draft Environmental Impact Statement addresses 20 proposed amendments to the California Desert Conservation Area Plan of which 1 is the proposed Bureau of Land Management/Department of the Navy Cooperative Agreement (Agreement) in Imperial County, California. Much of the land covered by this Agreement is Bureau of Reclamation (Reclamation) withdrawn lands, and has been reserved for the All-American Canal System, as provided for in the Boulder Canyon Project Act of December 21, 1928 (45 Stat. 1057). Certain areas have been identified by Reclamation for continuation of the existing withdrawal order to effectively protect and manage the Federal irrigation facilities. In these areas, Reclamation shall continue to have superior rights over the use and management of the lands. We are enclosing a copy of the proposed Agreement, Appendix E in the Draft Environmental Impact Statement, with necessary revisions which provides for Reclamation participation as decision making agency.</p> <p>We have also incorporated in this Agreement the revisions to Article VI.D.2, as agreed to on April 29, 1986, between Mr. Roger Zortman of your El Centro Resource Area Office and members of my staff.</p> <p>There was a meeting at the Imperial Irrigation District on April 16, 1986 concerning the above subject with respect to our letter of November 26, 1985 to you concerning the proposed cooperative agreement among the Department of the Navy, the Bureau of Reclamation, and the Bureau of Land Management authorizing the Navy to utilize certain Federal lands.</p> <p>Attached is a copy of the modifications which we have agreed with Roger Zortman of the Bureau of Land Management that would satisfy our requirements if the EIS is so amended. Recognizing that you will be meeting with the BLM on this subject in the near future, please use these modified pages to insure that our concerns are adequately addressed.</p>	<p>Your revisions have been incorporated into the revised cooperative agreement (Appendix E).</p> <p>Same as preceding response.</p>
Imperial Irrigation District		

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Sierra Club	<p>It does not clearly state what the new military use levels will be</p> <p>Is any change in military use anticipated, or is it only expecting to continue existing use patterns? What levels are these? How much use of the areas, numbers of flights, levels of sound are presently occurring? What levels are anticipated? What heights, pull ups, etc.?</p>	<p>A section has been added describing current military operations (see Chapter 4, p.4-1). Additional descriptions are contained in the Navy's DEIS on Land Acquisition and Management Within Range Safety Zones and in the Cooperative Agreement (Appendix E, pp. 2-4). The Navy does not intend to increase activities in the study area through the proposed cooperative agreement. If any increases are proposed in the future, NEPA requirements will be met through an environmental assessment or an EIS.</p>
Sierra Club	<p>In none of the alternatives is there offered protection for cultural artifacts from earlier Native American cultures. The intent should be to protect the resource to the extent possible. BLM has failed to do so, and under this plan amendment has not remedied this failure. Moreover, as stated in the Draft EIS, the Navy has also failed to do so, and numerous sites have suffered irreparable damage. There is no evidence of any effort to protect the resources under the new classifications. Indeed, it appears that the damage to the resource will be much more severe following the adoption of Plan Amendment 1.</p>	<p>Alternatives D and E increase the level of protection for cultural resources over that of the proposed action (Alternative A). These alternatives substantially reduce the size of the MUC I area and limit travel in the remaining MUC L area to approved routes. Alternative E recognizes existing motorcycle race courses but limits them to existing routes. The administrative control of vehicle use will translate into effective net protection for cultural resource values. The Bureau has in a good faith effort, fenced off one area and entered into a contractual agreement to study a well defined site complex.</p>
Sierra Club	<p>There is no alternative which would represent an environmental protection option. The "minimum use" alternative is still a "use alternative," and not a protection alternative. This amendment would continue to authorize competitive ORV events in the currently unclassified areas. It makes no effort to change the presently classified "open" or class I areas to a much more restrictive class which would reduce the pace of loss of natural and cultural resources in the area, especially with respect to the area around the Superstition Mountains.</p>	<p>The alternatives considered cover a range of actions and comply with NEPA requirements.</p>
Sierra Club, National Resources Defense Council	<p>The intent of NEPA was blatantly circumvented in the series of "negotiation" (page 2-14 paragraph 3) meetings either held or attended by BLM on this issue. They were not open to participation by any representative of an environmental organization. Members of our organization were specifically excluded. The "public notification" letter issued by the El Centro Resource Area did not include any member of</p>	<p>The amendment was presented at the Advisory Council meeting of May, 1985. The meeting was open to the public for scoping or comments. Scoping as well as a lengthy discussion, was held at the preceding meeting at San Bernardino in February, 1985. Eighteen members of the audience commented on the proposal. Several representatives of the environmental community were present. All public meetings held</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>the public representing an environmental protection position. Scoping for this amendment was not a part of the Desert Advisory Council meeting held on May 17, 1985. The only organizations participating were the Navy, the BLM, and Off-Road Vehicle groups with an interest in expanding the open areas.</p>	<p>in San Diego, El Centro, Yuma, and Riverside for the discussion of the Navy proposal or the Recreation Area Management Plan for the Imperial Dunes were advertised and open to all interested parties. The meeting with Congressman Duncan Hunter was requested by off-road organizations; the goal was to propose a plan which would allow continuance of vehicle use in the study area, while satisfying the requirements of the Navy. At the time of the meeting, little was known about wildlife, cultural or vegetative resources in the Navy lease area, so no effort was made to invite other interest groups. Information gathered during the present study, along with input from governmental agencies, environmental organizations and individuals has shown the presence of highly sensitive resources within the study area. As a result, the Bureau's preferred alternative has been modified to offer more protection for these resources.</p>
<p>Sierra Club Wilderness Soc. National Resources Defense Council Christine M. Kudiya Kevin Royle</p>	<p>The impacts of the proposed amendment on Wilderness Study Areas is not described. Fish Mountains Wilderness Study Area, an area recommended for wilderness under the approved Desert Plan, lies within RSZ B, yet there is no mention of any effects on this WSA. The effects of the expanded ORV open areas on the adjacent WSA's is not addressed. The effects of the expanded "designated routes" on the Wilderness Study Areas is not addressed. Since there are two ORV open areas immediately adjacent to WSA's this must be addressed. Effects on the Coyote Mountains WSA, immediately adjacent to the "Study Area" on the southwest must be considered, as well.</p>	<p>The impacts to WSAs of various alternatives for Amendment One are discussed on pp. 4-8, 4-15, 4-18, 4-21, 4-25, 4-28, 4-30, and 4-31 of the DEIS. The study area is defined by the outer limit of the Navy's safety zone RSZ C. This boundary is considered by the BLM to be the outer limit of potential impacts resulting from the proposed action. The two WSAs which fall within the study area (Fish Creek Mountains and North Algodones Dunes) happen to be recommended suitable. Two other nearby WSAs (Coyote Mountains and South Algodones Dunes) were excluded because they are located outside the study area, not because they are recommended unsuitable for wilderness.</p> <p>ORV management of the two unsuitable WSAs ("closed" for Coyote Mountains and "open" for South Algodones Dunes) will not be affected by the proposed action. The closure of the Coyote Mountains WSA is effectively enforced by natural topographic barriers and is not expected to be impacted. ORV use levels of the South Algodones Dunes WSA are not expected to change under the proposed action, since no new access to the WSA is proposed and use of existing ORV facilities in the Class I area north of the WSA will continue as at present. Both unsuitable WSAs are located in areas which do not normally experience low overflights by aircraft approaching the target areas.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
		<p>No ORV impacts are anticipated on WSAs located within the study area under any of the alternatives. The vast majority of lands in both the North Algodones Dunes and Fish Creek Mountains WSAs are closed to ORV use and will remain so under the proposed action. Except for the closure of some East Mesa lands around Target 68 in Alternatives A, D, and E, ORV designations of lands surrounding the North Algodones Dunes will remain unchanged, and no change in the level of closure violations is expected. Although occasional aircraft overflights will continue, they are not expected to constitute a significant change in impacts from those already existing from military overflights which have taken place here since World War II.</p> <p>Impacts to the Fish Creek Mountains WSA from overflights are not expected to change significantly from those that existed at the time the area was established as a WSA. The existence of an open ORV area adjacent to this WSA would have no significant impact (see p. 4-18). The WSA boundary is defined by natural topographic features which prevent vehicle entry. Although the Navy lease lands adjacent to the Fish Creek Mountains have received largely unrestricted ORV use for many years, the WSA has not been subject to vehicular trespass.</p> <p>The study zone encompasses the public lands in Imperial County required by the U.S. Navy for bombing practice and other aviation activities. Safety and noise considerations extend only through the designated area. Further information can be found in the "Compatible Use Zone Study Aerial Weapons Target Ranges R-2510 and R-2512" published by the Naval Air Facility in El Centro.</p> <p>The Bureau and the Navy have worked cooperatively in the preparation of the DEIS for the 1985 Desert Plan Amendments and the DEIS for Land Acquisition and Management Within Range Safety Zones R-2510 and R-2512. This EIS addresses changes in the Desert Plan which are necessary to implement the BLM/Navy cooperative agreement. Only public lands are considered. The Navy DEIS addresses actions necessary to fulfill the Navy's needs on private lands in the same project area. The subjects are not necessarily the same. The docu-</p>
Sierra Club	<p>The "study area" is in fact only a delineation of the proposed Range Safety Zones. The impacts of the cooperative management agreement and the changes in classification will have impacts beyond those delineated by the boundaries of the RSZ's. By law you are required to analyze all of the impacts, including impacts on adjacent areas. Artificially confining the area studied to the Range Safety Zones being established does not meet the requirements of law.</p>	
Sierra Club	<p>We have heard that the NAVY is preparing a separate environmental document for the Navy and private lands covered by this change. On this point NEPA is quite clear: All of the impacts to all of the lands are to be addressed in a single document. If the lands fall under the jurisdiction of more than one agency, then one agency is to be selected as the lead agency and is responsible for preparing the document over the entire area. Since this draft document does not include impacts to the public lands, nor to the Navy lands left un-</p>	

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	classified, it clearly does not represent an adequate EIS under either NEPA or CEQA.	The documents reference each other, and the relationship is explained on p. 1-1. We feel this procedure is in compliance with NEPA guidelines.
Sierra Club Wilderness Soc. Kevin Royle	The document does not address the impacts to the ACEC at San Sebastian Marsh/San Felipe Creek. The area will be surrounded by additional ORV open areas. It does not reference the management plan for this ACEC. Is there an ACEC management plan?	The DEIS on p. 4-6 states that Alternative A does not impact vegetation in those areas in which the multiple-use class will remain the same, including "....critical habitat for thedesert pupfish." The San Sebastian Marsh ACEC falls into this category. Even under Alternative C, the nearest new Class I area is several miles south of the ACEC. The draft ACEC management plan for this ACEC was distributed for public review on June 27, 1985. The Plan outlines additional vehicle restrictions for the majority of the ACEC.
Sierra Club	The document does not address impacts to the Butterfield Overland Stage Route, the historic route crossing the Colorado Desert.	This amendment proposes no changes in the management of the Butterfield Overland Stage Route. No impacts are anticipated as result of the amendment.
Sierra Club	The mapping of the changes is confusing, conflicting and lacking in important details. Alternative A is described on page 2-2 as "Change vehicle access on class I lands from limited to open (Map 4)." The map does not show where the changes will be made. The new Class I lands are not indicated on this map, they are on a previous map. There is no map of the existing multiple use classes except as presented on map 7 in connection with another alternative. Notation changes from map to map, adding to confusion.	We agree that this is a complex proposal and that the number of maps required makes interpretation difficult. The description of Alternative A on pages 2-2 and 2-3 in the DEIS was lacking in important details and conveyed inaccurate information. It has been revised to indicate the maps which should be compared in order to understand the proposed action. The fact that various designations and multiple-use classes are not depicted consistently between maps also makes interpretation difficult. However, the maps are accurate, and careful attention to the key of each map will allow correct interpretation.
Sierra Club	The descriptions of the effects on the environment, especially the cultural resources, vegetation, and wildlife, including candidate species for listing by the U.S. Fish and Wildlife Service, reads like a rationale for CLOSING THE ENTIRE AREA TO ALL ORV ACTIVITY. Instead of closing, we find the preferred alternative is to EXPAND the ORV open area.	The preferred alternative has been changed to Alternative E (Multiple Resources), which protects sensitive resources and reduces areas available for ORV activity. Although additional acreage will be formally designated "open" to vehicle use on the West Mesa, there will actually be significant restriction in ORV use compared to current unregulated use patterns.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Sierra Club	BLM does not anticipate being able to limit ORV activity to the expanded areas and routes.	The Bureau anticipates that the more restrictive ORV management policies become, the more money and staff will be required to implement them. Among the alternatives, Alternative B (no action) would be the least, and Alternatives D and E would be the most labor-intensive to implement. The Bureau expects to be able to limit ORV activity under any of the alternatives.
Sierra Club	The only rational given for expanding the open area is that closing would be expensive. This action follows the BLM's precedent set in the Barstow - Vegas Race case where instead of stopping illegal activity BLM has reversed its position and will now sanction what was illegal activity. This expedient is not in the public interest, and does not protect the Native American cremation site mentioned in the Draft EIS.	The revised preferred alternative (Alternative E) provides more protection than Alternative A to sensitive wildlife, cultural, and vegetative resources by limiting vehicle access to designated roads in much of the former Navy lease area.
Sierra Club	There is no need for additional ORV areas in Imperial County. The area already has an open area south of I-8, in Mammoth Wash, and near Glamis, all in the Algodones Dunes. It has a state operated open area near Ocotillo Wells which is slated for an expansion which would quadruple the size of the area. These are all in addition to the giant area east and west of Plaster City. See Amendment 16 for additional remarks on the status of ORV activity in the state.	There is a significant demand for ORV use areas in Imperial County, brought about in part by the general shortage of such areas in counties located closer to Southern California's coastal population centers. Recreational visitor use days associated with ORVs are growing by approximately 5 percent annually in the El Centro Resource Area. Superstition Mountain is already the second most heavily used ORV area in Imperial County, with 70,000 VUDs annually. The Imperial Sand Dunes (Algodones Dunes) area is the busiest, receiving over 800,000 VUDs yearly. Plaster City, Arroyo Salada and Ocotillo Wells open areas are also popular.
Wilderness Society Kevin Royle	Factual information regarding number of flights, airspeed, and sound levels are absent from the analysis.	Regrettably, the DEIS did not make it clear that no changes in types or amount of military activities are planned through the proposed action. Thus it is not necessary to provide detailed information on military operations or their impacts. A statement has been added to the amendment description (Chapter 4, p. 4-1) to clarify this point. Also added is a brief description of the types of aviation activities which are occurring. Further information can be found in the DEIS for Land Acquisition and Management Within Range Safety

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Audubon Society, Yuma	<p>We are concerned that the proposed actions for parts a. and b. of this amendment would lead to an accelerated deterioration of both cultural and biotic resources of East and West Mesa. This deterioration is unacceptable.</p> <p>The management of the unclassified lands in the two study areas (East and West Mesa) needs to be resolved, and we have no objection to the concept of an enlarged Navy withdrawal. But, the management of these areas must allow for the protection of the biotic and cultural resources found there. We are particularly concerned about the proposed action for West Mesa.</p>	<p>Zones R-2510 and R-2512 by the Naval Air Facility at El Centro. The Cooperative Agreement (Appendix E, p. 3) states that a noise hazard exists in areas close to the target, with peak sound levels exceeding 100 db(A) and Community Noise Equivalent Levels (CNEL) exceeding 80 db.</p> <p>The U.S. Navy will be in sole control of RSZ A areas. Specific proposals for activities within these areas must be directed to CONAF, El Centro, CA. As a federal agency, all appropriate laws apply.</p>
Audubon Society, Yuma	<p>The West mesa area contains good populations of two category 2 candidate lizard species for the federal list of threatened and endangered species; namely, the flat-tailed horned lizard and the Colorado desert fringe-toed lizard. In addition, the area is home to 5 rare plants including significant numbers of <u>Pilostyles thurberi</u>. We feel that nothing short of Alternative D will adequately protect these species. Furthermore, we feel Alternative D is needed to protect the area's sensitive cultural resources.</p>	<p>The revised preferred alternative, Alternative E, reflects your concern.</p>
USDI Fish and Wildlife Service	<p>The EIS for this amendment indicates that the FTHL would experience indirect impacts resulting from the land use change designations. The most serious would be increased ORV vehicle use.</p>	<p>Increased ORV use is expected on West Mesa, though this would not occur as a direct result of the proposed land use designation Changes. The Superstition Mountain area is already the second most intensively used ORV area in Imperial County. Use of the area is expected to increase by about 5 percent annually regardless of the alternative selected.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
USDI Fish and Wildlife Service	The selection of Alternative D would reportedly reflect the land use pattern that presently exists. An area intensively used by ORV's would be designated Class I. ORV use outside this area would not be encouraged. It is likely that this high density FTHL area would remain.	Alternative D does not reflect the current land use pattern. While the "open" area as defined by Alternative D does include most of the area presently used for ORV-related camping and staging, ORV activity occurs throughout the Navy lease area on a largely unregulated basis. Alternative D would significantly restrict current ORV opportunities, especially in the moderate to high use areas between Superstition Mountain and the powerline southwest of the mountain and in the mudhills north of Wheeler Road.
National Resources Defense Council The EIS states that "the severity of ... impacts would depend upon the level of military use. As long as the current level and pattern of use continues, impacts are likely to continue at their present level However, if the number of targets, locations..., or types of uses change, areas negatively impacted would increase." EIS, pp. 4-5 to 4-6. However, the EIS supplies no information about existing Navy activities or quantified estimates of future use. Consequently, these statements are meaningless.	The excerpt you quoted has been revised to clarify the misconception which appeared several times in the DEIS. The amendment does not propose an increase in current military operations in the study area. If an increase were needed in the future, an EIS would be required to fulfill NEPA guidelines. Navy activities have occurred in the study area over the last four decades. Field inventories indicate resource conditions are not seriously impacted by these activities. The proposed action of continuing existing military use is not seen as being any different in scope or intensity from past use. Future levels of use are unpredictable, and any increases can be accurately assessed when those proposals are defined at some future date.
National Resources Defense Council, Ted Rado	Notwithstanding the fundamental inadequacies of the EIS, however, it is clear that, at least in the West Mesa area, adoption of amendment 1 will in fact negatively impact the flat-tailed horned lizard, a Bureau-designated sensitive species that is also a candidate species for federal protection. Thus, for example, the EIS concedes that the "negative impacts of proposed "MUC changes alone" would be especially significant with regard to the Federal candidate flat-tailed horned lizard." EIS, p. 4-5. We submit that acceptance of this alternative is contrary to the Bureau's policy regarding candidate species which requires you to 'improve populations and habitats of ... animals which are candidates for listing ... to a point at which protection under the Endangered Species Act is no longer proposed or necessary.' BLM Manual 6840, quoted at p. H-1 of the EIS. Moreover, amendment 1	The revised preferred alternative, Alternative E, reflects your concerns.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>is also contrary to the California Office's own policy on sensitive species which directs you 'to manage the public lands so as to prevent deterioration of sensitive species' habitat, thereby precluding the need for State or Federal listing.' CSO IM CA-82-190, quoted at id. Finally, the alternative is plainly contrary to the Goal Statement of the Wildlife Element of the CDCA Plan which provides that the Bureau shall "manage ... wildlife species officially designated as sensitive ... so that potential for Federal or State listing is minimized." CDCA Plan, p. 30 (1980). Under these circumstances, we submit that the Bureau is obligated to reject this alternative.</p>	
Ted Rado	<p>I strongly advocate that the Bureau either drop this proposal from consideration until some unspecified future date when a more comprehensively planned and environmentally balanced alternative is developed, or implement the protection-oriented alternative D, which emphasizes protection based on existing Bureau data clearly showing that the flat-tailed horned lizard is at risk under current conditions.</p>	<p>While the decision process does not provide for a voting for alternatives, the data collected from field inventory of several resources and specific data provided from public and agency responses justify selecting the Multiple Resources Alternative E.</p>
Ted Rado	<p>Amendment 1B (east): I favor deferring consideration of this amendment until additional surveys under appropriate temperature regimes and seasons of activity are conducted for the flat-tailed horned lizard on several thousand acres of potential "optimal" habitats which would be affected by this action. Insufficient survey work has been undertaken in the area to date to reliably estimate extent of impact from proposed actions. Such surveys could be conducted this spring, and an amendment proposal incorporating study results developed for the 1986 Desert Plan Amendments.</p>	<p>Survey work was performed in proportion to the value of the resource anticipated, due to very limited field time. Northern East Mesa, while once highly valuable habitat, had very low flat-tailed horned lizard relative abundance during surveys in 1979. Additional limited field work in 1985 confirmed this. Since Alternative A is more restrictive than the current situation, it was felt that even if areas of highly valuable lizard habitat were present, they would be protected.</p>
Jacqueline Wolff	<p>The intention behind the Navy/BLM Agreement is commendable, but the internal logistics fall apart on the problems of ORV activity and your mandate to protect the flat tailed horned lizard. After comparing Map 13, the Alternative D MUC, against the Alternative B (No Action) Recreation Map 19, I don't see how Alternative D denies that much access to ORV use, since much of the area towards the west bound-</p>	<p>Alternatives D or E would represent a significant restriction in ORV use on Navy test range lands, compared to present use. Although the test range is officially designated as "limited to public roads," it has, in fact, been available for largely unrestricted ORV use for many years. The Bureau is currently working with the American Motorcyclist Association (AMA), District 38, to develop a cooperative</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Jacqueline Wolff	<p>dary of the area in question that would become Class L under Alt. D but nowhere is the idea broached that agreements could be reached with ORV organizations analogous to the Navy/BLM arrangement, with both use and protection.</p> <p>Otherwise you consign the flat tailed horned lizard habitat to the area due south and east of the Superstition Hills to be withdrawn by the Navy and a couple of sections near Class L land towards the west and north under your jurisdiction per your preferred alternative.--dismal prospects for the lizard, and a give-away to the ORV faction. Considering the cooperative agreements made for the fringe toed lizard in the Coachella Valley, why can't parallel protection be worked out for the flat tailed horned lizard?</p>	<p>agreement for managing ORV races sanctioned by AMA in this area. This would assist in insuring continued opportunities for organized events, while assuring that sensitive areas would not be used.</p> <p>The revised preferred alternative (Alternative E) provides more protected area for the flat-tailed horned lizard.</p>
U.S. Navy Air Facility El Centro, CA	<p>Maps 5 and 6 must be corrected to extend MUC L (Map 5) and the "closed" area (Map 6) south approximately one-half mile to correspond with the southern boundary of Target 68 Range Safety Zone (RSZ) B. Page 2-20 states that MUC L would extend a short distance "outside" RSZ B in order to incorporate existing roads as readily identifiable boundaries. Public access into the B Zone is not desirable for reasons of public safety.</p>	<p>As agreed at our conference on July 7, 1986, the boundary of the MUC L area (Map 5) and the boundary of the "closed" area (Map 6) will remain as shown, since the road which forms the boundary is easily enforced on the ground.</p>
U.S. Navy Air Facility El Centro, CA	<p>As documented by the enclosed letter, Imperial Irrigation District (IID) has never considered Corridor M for construction of electrical transmission lines. Since Corridor M, as shown on Map 8, penetrates RSZ's A and B in Targets 68 and 95, we recommend the relocation of Corridor M to the East Highline Canal.</p>	<p>Corridor M is a recognized corridor in the Desert Plan, 1980. Map 8 is corrected to show the intended corridor location next to the East Highline Canal.</p>
U.S. Navy Air Facility, El Centro, CA	<p>The route shown on Maps 4, 10, and 13 as the alternate access for the closure of Huff and Imler Road is not correct. The proposed route will start at the intersection of Huff and Wheeler Roads, extend east on Wheeler Road, north on Pearle Road, and finally east on Edgar Road to the intersection of Edgar and Forrester Roads.</p>	<p>Your comments were noted. Maps 4, 10, and 13 have been revised to remove the proposed alternate access route from Imler to Huff Road.</p>

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COMMENTER	COMMENT	RESPONSE
U.S. Navy Air Facility, El Centro, CA	On Page 2-15 add the following to the paragraph which begins, "Unclassified Navy Lease Lands to MJC I"; ... withdrawn to the Navy, and to install visible markers along the crestline of Superstition Mountain to establish a readily identifiable boundary.	Your comment was considered. Decision was made that the installation of markers was not needed because of the agreement made on July 7, 1986 (see revised Cooperative Agreement).
State of California Department of Transportation	The Department of Transportation is concerned with the high quality aggregate sites in the California Desert Wilderness Study areas. Therefore, the Department requests that the Bureau of Land Management provide long-term or permanent permits for the use of these sites. The department discussed this concern at length in its March 18, 1986 letter to Mr. G. E. Hillier.	The Bureau has a mandate, through the Federal Land Policy and Management Act of 1976, to manage Wilderness Study Areas in a manner so as not to impair their suitability for preservation as wilderness. Activities which may cause impairment are those which cause surface disturbance which cannot be reclaimed to the point of being substantially unnoticeable in the area as a whole by the time the Secretary is scheduled to make a recommendation to the President on the suitability of the WSAs for inclusion in the wilderness system. It is anticipated that the Secretary will make these recommendations to the President in June, 1989.
Metropolitan Water District of Southern California	Amendment 1a It could also impact a small portion of the Westside Main Canal and some laterals owned by IID. Our concern centers on the possibility that access may be restricted if canal lining or other conservation projects are undertaken in this area by IID. Provisions should be incorporated into the EIS to avoid adverse effects on the implementation of water conservation measures by IID in this area.	As a result of this mandate, the Bureau cannot authorize any long term or permanent material permits which may cause impairment. If, however, the California Department of Transportation is willing to perform aggressive reclamation, the Bureau may be able to authorize short term permits, on a case-by-case basis, not to extent beyond June, 1989. Since this would provide for only a temporary supply of material, it is recommended that the Department identify other sources of material on lands which are not within a WSA.
	Amendment 1b Our concerns are similar to those for 1a. From the material provided, it appears that portions of the East Highline Canal may have more restrictive access imposed due to land reclassification.	Existing U.S. Navy uses that are recognized by the proposed action provide for and are not constraining to any existing rights-of-ways including the Westside Main Canal and tributary canals.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTS	RESPONSE
<p>Harriet Allen</p> <p>Imperial County Planning Dept.</p> <p>Imperial County Planning Dept.</p>	<p>fication. This amendment may have potential impacts on IID conservation projects, and as with the West Mesa, provisions should be made for the necessary rights-of-way for such projects. In addition, a large potential groundwater supply exists on the East Mesa. Possible uses are still in the early stages of development, and may include extraction and recharge. It would not be desirable to have the potential uses of this significant resource limited by the proposed action. The EIS does not mention this resource, and thus does not account for the opportunity that may be foregone to develop it.</p> <p>Amendment No. 1 seems to be a two-way gift of public land: to the U.S. Navy and the OHV community, aided and abetted by the District Congressman. Valuable desert resources of national and international importance are in jeopardy. Until the U.S. Navy EIS is available for coordination with BLM amendment documents, no action should be considered. Recommend delay on No. 1.</p> <p>In the review of the "Cooperative Agreement," page 12, where it states: "...the following corridors identified in the CDCA plan...", it should read the "Geothermal/Transmission Plan" or in the alternative--state in the CDCA "and/or Geothermal/Transmission" plan.</p> <p>With regard to geothermal development, the Draft EIS mentions the impact on the Truckhaven area and a portion of the East Brawley KGRA and could be "...severely restricted because drilling operations would be limited due to height restrictions. The necessity to move drill sites because of height limitations could make it unfeasible for a lessee to explore and develop his lease..." (page 4-12)</p> <p>Since BLM and County both have jurisdiction with regard to the permitting of geothermal powerplants in Imperial County, depending on ownership and location, any limitations on the full development of the geothermal resource found in the County would be against County policy, and presumably national policy.</p> <p>The revised preferred alternative, alternative, E reflects many of your concerns. The Bureau and the Navy are coordinating on the environmental statements for the public and private lands for this project. No actions will take place until both documents have been completed and reviewed by the public.</p> <p>The cooperative agreement addresses the public lands within the study area (RSZ A, B and C). Only utility corridors within this area were considered.</p> <p>Please see revisions of the section on geothermal, p. 4-12 in Chapter 4.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Imperial County Planning Dept.	The County wishes to fully develop its geothermal resource, the IID wishes to upgrade and build the 230-kV transmission line wherever the Draft EIR indicates is the recommended route and is approved, the Navy appears to have no problem with the height of the proposed line in the East Highline Canal planning corridor, and the geothermal developers are in the process of negotiating the cost of building such a line as well as simultaneously getting their permits for powerplants in the County and on BLM land--there should be no impediments to the full development of Imperial County's geothermal resource.	The location of Corridor M has been corrected on Map 8. Requirements for new installations in Corridor M are given in section VI D2 (p.16) of Cooperative Agreement.
International Technical Corporation	IT Corporation ("IT") operates a hazardous waste disposal facility five miles west of Westmoreland in Imperial County, California, on Section 16, T138 R12E S.B.B.&M. Incident to that operation, BLM granted the company Right-of-Way Serial No. CA 6577 on October 27, 1980. That document provided for a road in Sections 15 and 22, as well as a flood diversion berm in Sections 17 and 20. Our analysis of the "Proposed 1985 Amendments" revealed that Sections 16, 15 and 22 are outside of the study and would not be impacted by the project described. Sections 17 and 10, on the other hand, are inside the study area, and would appear to become MUC M (moderate use) lands under Alternative A. It is not clear exactly what height restrictions would apply in these sections. It holds a BLM right-of-way in these sections which is visited frequently for inspections and berm maintenance in compliance with the terms and conditions of the grant.	Your right-of-way is situated in an area proposed to be managed through a cooperative agreement between BLM, Bureau of Reclamation (BUREC), and the Department of the Navy. Possession and management would be retained by BLM and BUREC while recognizing potential conflicting uses required by the Navy. Existing rights-of-way within this area may remain without modification or movement. Any requests for modifications and/or new installations exceeding the established height restriction would be subject to the concurrence of the Navy. The height restriction in this area is 40 feet. The Class M designation limits vehicle travel to existing roads and trails, which is the same situation that has been in effect in the subject area for several years.
	Clarification regarding all the restrictions that would apply to Sections 17 and 20 is requested. Further, BLM is requested to provide written confirmation that the project will not affect IT's right-of-way for the diversion berm in Section 17 and 10 and its regular maintenance.	Owing to the nature of the involved right-of-way it is unlikely that the proposed amendments will affect the continued use and maintenance in any way.

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SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Florence C. Shipek	Many of my objections are the same as those which I wrote opposing the Draft EIS for the Table Mountain Area of Critical Concern. The actual interviewing of the Kumeyaay by the BLM was conducted in a fashion which would ensure that the information sought would be presented in an obscure manner and thus not confirm the data acquired in a more effective fashion by Clyde Woods of Wirth Associates.	Requests for Native American input were consistent with Bureau policy.
Florence C. Shipek	Secondly, much basic archaeology of the area under consideration was conducted by firms which have done a great deal of incompetent work in southern California and based upon an incorrect view of Southern California Indian cultures, land use and management practices. Therefore I am concerned and believe that more competent work should be used to develop cultural resource data upon which I can rely.	Your comment is noted.
Florence C. Shipek	Finally, I am concerned about the continuing use of the fragile desert by off road vehicles which permanently damage the biota as well as archaeological sites and cremation and burial areas. While I realize that Navy use of the desert land also involves some permanent damage due to gunnery blasts and vehicular use, their use has the purpose of providing our servicemen with the necessary practice for protecting our nation while no such excuse can be made for off road vehicle use. I also hope that the Navy avoids desecrating cremation and burial grounds.	The two identified cremation sites are currently protected.
San Diego Off-Road Coalition (SDORC)	The elimination of Imler road is an excellent example of the situation. This Imperial County road has existed since 1931. To the north of Imler Road the Navy has maintained their target area since the early 1970's. Thus, Imler Road serving as public access to the Superstition Mountain and Rock House area is status quo.	Imperial County is an author and sponsor of the draft Cooperative Agreement. The abandonment of the county road (Imler) is supported by Imperial County as long as the abandonment does not take place before extension of Wheeler Road which is Imler's replacement.
AMA District 38 (AMA-38)		
Patrick Sibley		

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
SDORC AMA-38	The mud hills and the popular desert landmark known as "The Dip", immediately south of Imler road, have been used by off-road vehicle recreationists for as long as we can remember. Under the Navy's "no expansion" proposal public use of Imler Road, the mud hills and the "The Dip" would be prohibited. No matter how one interperates it, the Navy's proposal goes far beyond status quo and therefore represents a major expansion of Naval operations area at the publics expense.	Technically "the dip" would remain open as would the mud hills. However, there would need to be a separation between recreation use and Target 101. This boundary would be defined on the ground as an enforceable separation.
SDORC Patrick Sibley	The proposed Wheeler Road extension represents a costly alternative to the current access road. It is proposed to end at much the same point as Imler Road but in doing so crosses areas that are often heavily damaged by winter rain storms common to this area. Because of it's length and the terrain which it will be crossing construction and maintenance will be costly in order to provide access to large motorhomes and trailers now using Imler Road.	The Wheeler Road extension would be designed and maintained by Imperial County. The experience of the County's Public Works Department has been outstanding in maintaining a road network within the desert environment.
SDORC Patrick Sibley	Should the new road be closed, due to storm damage as it would have during December of 1985, while users are in the Superstition Mountain area emergency evacuation operations would be required to get the public and their property out of the area. Emergency repairs to the road that would have been required in December of 1985 could not have been accomplished in a reasonable amount of time to allow members of the public to leave the area.	Road design can accomodate 100-, 150-, or 200-year storm sizes. It would be necessary to provide a road design to accomodate the size storm of December, 1985.
SDORC	The proposed road also presents a major safety hazard since off-road motorcycle races would have to be started across it. Stopping traffic on the road to allow 300 motorcycles to cross at a high rate of speed is a very dangerous situation and could leave the Navy, BLM and County of Imperial open to litigation should an injury or death occur. Off-road vehicle recreationists would also be crossing the road at will creating even more dangerous situations. With Imler Road intact this is not a problem.	The control of vehicles on the proposed road extension to allow for racing starts is not unrealistic. It may be necessary on some races, depending on the course approved. ORVs would be crossing the road to use public lands on either side. This type of crossing over is not unusual to many areas in the CDCA. It can be facilitated by underpasses and/or crossing lanes.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Patrick J. Sibley	The U.S. Navy and BLM should realign the RSZ "A" boundary of Target 101 north of Imler Road and the Navy be given acreage in RSZ "B" north of Superstition Mountain to compensate for the area lost by the boundary realignment. These two actions will give the Navy the RSZ "A" acreage required without spending enormous sums of money on road construction and maintenance.	Cost comparisons between realigning Imler Road vs. relocating Target 101 weigh heavily against moving Target 101, due to the investment already made in the 101 complex.
SDORC, AMA-38,	The western most boundary of the parachute drop area should either be moved to the east or the patented section of land between the parachute drop zone and Target 103 should be purchased and included in the MUC I area. This would allow continued access into and out of the Plaster City ORV Open Area. Since the public is already losing 1,280 acres of MUC I land and 1,540 acres of MUC M lands to this proposal this would somewhat balance out this loss.	Project plans will be drafted to either purchase or seek legal access across the private lands of T 15S, R 13E, Section 16.
SDORC, AMA-38, Patrick Sibley	The western boundary of Target 101 should be realigned to follow the existing road identified as P 3 on the Navy's map of R-2510 (1316-250, P.W. 947). The MUC I boundary should follow this re-alignment also. This allows public use of areas now being used by the public and provides an easily identifiable boundary.	Comments noted in reaching the final decision.
SDORC	With the above modifications both the stated goals of the Navy and the goals of the off-road vehicle recreation community would be reached.	Comment noted.
AMA-38	Plaster City target expansion: If it absolutely must be enlarged then do it to the north; the south and west expansion hurts the off-road community.	Target 103 is not to be expanded but adjusted to accommodate the exact center of Target 103.
AMA-38	The new parachute drop zone: We understand the requirement. Just don't close to off-road activity on weekends. Let's work together.	The Parachute Drop Zone is not new but is the name given to the Camelot, Bullhead, Whirl Tower parachute testing area. It provides for practice drops from C-130s and other aircraft while providing safety to the public.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
AWA-38	The fencing of the Superstition Mountains. Wipe it out of all Navy plans. This is unacceptable. This is one area of no compromise. The cost, maintenance, and manpower to patrol it is not cost effective.	Fencing off the Superstition Mountains has not been discussed and will not occur.
AWA District 38	While none of the presented alternatives follows the above guidelines, Alternative C comes the closest to maintaining existing uses. As stated in the DEIS: "In Alternative C, emphasis would be placed on preserving existing recreational opportunities and minimizing the cost and level of management. The objective would be to come as close as possible to maintaining the existing situation..." With the exception of Imler Road and the area south of Imler Road this is true. Realignment of the west boundary of Target 101 RSZ A, as mentioned above, would insure that these existing public uses would continue. Alternative C also presents the least costly management alternative and at a time when federal budgets are being cut this serves to make Alternative C much more inviting to the tax paying public both those who recreate in the area and those who don't.	While recreation is an important use, it is not the only use mandated by FLPMA (1976) that must be managed by BLM on public lands. Alternative C does not adequately address our multiple use responsibilities which were not considered in the Navy lease area in formulating the Desert Plan. Amendment One will include this area into the Plan and, in so doing, require that all multiple use management responsibilities be addressed.
Patrick J. Sibley	Item number two is the proposed establishment of a boundary between Multiple Use Class "I", "L" and Unclassified (Navy withdrawal) areas between Superstition Mountain and Target 101 on the West Mesa, Imperial County. Designating the ridgeline of Superstition Mountain as the boundary between these areas will create numerous problems for those who travel on and around the mountain. Superstition Mountain has many peaks and a ridgeline that wanders along the length of the mountain and will cause confusion in identifying the boundary for both the people that travel in the area and the law enforcement and other authorities responsible for enforcing this boundary. Loss of the area at the base of the North side of Superstition will greatly curtail the opportunity	The revise preferred alternative, Alternative E, reflects your concern.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
SDORC	<p>ilities for outstanding recreational experiences that are enjoyed by many people who use this area. Realignment of the RSZ "A" boundary along the service road that provides access to communication towers located on Superstition Mountain and Class "I" designation placed on land located between the ridgeline of Superstition and the Service Road will make patrolling of this boundary more efficient and make the boundary readily identifiable while providing the public with quality recreational experiences.</p> <p>In light of the current overcrowding in the Glamis/Gecko area, the expected continued growth in popularity of off-road vehicle recreation in the Southwest and the possible major adverse effects of Senator Alan Cranston's California Desert Protection Act of 1986, S. 2061, major adjustments will be required on the East Mesa.</p>	<p>The DEIS assesses only the effects of the proposed action. Eventual "what if" scenarios on S. 2061 or overcrowding of the Gecko area will be considered at the time and point that known impacts may occur. The Imperial Sand Dunes Recreation Area Management Plan (RAMP), which is currently being drafted and which you have assisted with, will address the management of the dunes well into the future.</p>
SDORC	<p>The area east of the Old Coachella Canal and south of Highway 78 serves as an overflow area for the Glamis/Gecko area on major use weekends. Because of the popularity of this unique area, the Imperial Sand Dunes, among off-road vehicle recreationists throughout the Southwest, overcrowding has already become a dangerous situation. The projected continued growth of the population in this region coupled with industry's projections for a continued upward spiral in the sale of off-road vehicles will push the current 9,000 VUDs in this area upward.</p> <p>Should Senator Cranston's legislation, S. 2061, pass, the VUDs in this area will at least triple. Because of dangerous overcrowding the public will be forced into this area if it is RSZ A or not. Planning now could eliminate major problems in the future.</p> <p>In order to achieve this, Section 3 south of Highway 78 and west of the Old Coachella Canal, must be eliminated from the proposed RSZ A of Target 68. Sections 3, 2, 11 and 12 should then be designated as MUC M allow for continued overflow from the</p>	<p>The Desert Plan is flexible and can be amended to address future actions when and if they occur.</p> <p>The enforceable boundary of Target 68 RSZ A and RSZ B will be the Old Coachella Canal. Anything other than this will create an unacceptable safety hazard and impossible enforcement problem near Target 68. The Bureau's liabilities have recently been restated in a \$500,000 suit against the U.S. Government for not preventing a near-fatal accident on Target 68 by two recreationists. These types of accidents must be stopped. Hazard avoidance is the first step. The proposed multiple use classes around Target 68 should assist in discouraging access to hazardous areas.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Patrick J. Sibley	<p>Glamis/Gecko area. Failure to plan now will present an even greater threat to public safety in the future and increase management and enforcement costs.</p> <p>The common concern of all who have interests in the areas covered by the proposed Special Plan Amendment Number One is the safety of the general public. Range Safety Zone "A" boundaries at Target 68 and Target 95, West (sic) Mesa Imperial Valley are adjacent to State Highway 78 and the Old Coachella Canal. State Highway 78 has an average daily traffic flow of over 1200 vehicles and the Old Coachella Canal is used by people traveling North from Highway 78. If the same public safety consideration given to Target 68 and 95 on the East Mesa were used at Target 101 on the West Mesa, I believe the suggestions I have presented to you could be used as part of a Plan Amendment that would be acceptable to everyone involved with the California Desert Conservation Area Plan.</p>	<p>The key difference is that the RSZ A Target 101 contains Imler Road within its boundary. The road runs very close to the target. In contrast, the RSZ A for Target 68 borders Highway 78, but the highway does not enter the range safety zone.</p>
AMA-38	<p>In February of 1985 a meeting of principles (sic) was arranged by the U.S. Congressman Duncan Hunter. In attendance was (sic) representatives for: The U.S. Navy, BLM, AMA, the San Diego off road coalition, Congressman Hunter, and the U.S. Gypsum Co. At the conclusion of the meeting the consensus of all was "status quo (sic)." It was agreed that the Navy proposed land withdrawal was brought about by the Bureau of Reclamation. They had decided to relinquish (sic) their lease. The Navy assured the off road community that nothing would change. They would use the same area's (sic) as before and so would we.</p>	<p>Preliminary meetings and workshops were held on this issue to adequately define the cooperative agreement and proposed action for the DEIS on CDCA Plan Amendment One. This process was only part of the public review and agency input needed to resolve the issue. Since February, 1985, a tremendous amount of data (field inventory), public comments, and agency comments have been received. This input must be considered in finalizing the EIS and decision. The "status quo" in the recreational use area will be modified, based on new data and information received.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTS	RESPONSE
<u>AMENDMENT 2</u>	
Audubon Society Yuma	We agree that agricultural use is inappropriate on lands which the Bureau intends to maintain in public ownership. However, "unclassified" lands are those lands which we feel should be returned to the private sector through sale or exchange. In addition, by allowing Desert Land Entry (Act of March, 1877) to remain on the books, Congress has shown its intention to permit agricultural development on arable public lands.
USDI Fish & Wildlife Service	We agree on the need for coordination between our agencies on all projects affecting wildlife on the public lands.
Ted Rado	The Bureau subjects all new microwave facilities to an environmental assessment (EA). Whenever a proposed site is located in an area of known public concern, a public review is carried out. Many new individual microwave towers are placed adjacent to an already existing facility, so that no new impacts are produced. NEPA guidelines and BLM regulations for informing and involving the public are followed on all projects. Lists of projects requiring EAs are available for public examination in each BLM office.
<u>AMENDMENT 4</u>	
Sierra Club Ted Rado Kevin Royle	The Multiple Use Class Guideline has been amended to include the statement: "In land sales or exchanges, NEPA requirements will be met."

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	AMENDMENT 6	
Ted Rado	While I agree that the intent of the goals specified on pages D-1 and D-2 are admirable, they are hardly measurable and may be difficult if not impossible to achieve. Please clarify in the FEIS what measurable (i.e., quantifiable) standards are being inserted into these element goals which will enable the public the opportunity to clearly gauge progress of Desert Plan implementation.	<p>Some of newly-stated goals will be difficult to measure in quantifiable terms. Note, however, that our objective was to create goals which are not only measurable, but also less vague and redundant and more consistent and achievable. We have altered some of the proposed goals to reflect some specific shortcomings pointed out by reviewers.</p> <p>In some cases the goal may not be stated in the form of a quantifiable entity, but measurement is still possible. For example, in Wildlife Element Goal 1, we are to "promote . . . through habitat enhancement projects such that balanced ecosystems are maintained..". The original goals were in terms of "managing", and did not refer to habitat enhancement projects even though they are a major activity of the wildlife program in the California Desert and throughout the Bureau. We can measure effort toward the goal by enumerating enhancement projects (e.g., acres developed, water sources developed, protective exclosures constructed). We can measure effectiveness by analyzing population trends of various species (sometimes called indicator species) which reflect ecosystem status (e.g., desert tortoise, bighorn sheep, raptors), or by analyzing quantities of various habitat elements (e.g., acres of riparian).</p> <p>Some goals are definitely stated in more quantifiable terms. For example, Wildlife Element Goal 2 calls for development of management plans (note that management plans are in fact the major pre-scription in the Wildlife Element). This activity can be quantified (e.g., number of plans, number of acres) more readily than the actions in the original goals which were in vague terms of managing or considering habitats and which were scattered throughout the goals.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Harriet Allen	Amendment 6 is completely unacceptable. The revised goals negate criteria, delete levels of compliance and expose the whole Plan and its implementation to exploitation at pre-1980 conditions.	It was not our intent to reduce the effectiveness of the Plan. The goals are substantially the same and do not nullify the Plan. Where pointed out by reviewers, we have tried to rectify shortcomings in the newly stated goals.
Sierra Club	BLM claims that the existing goals within chapter 3 are too vague to be measured, are redundant, and that "The intent would be to improve clarity and consistency without changing the intent or purpose."	In preparing the plan for reprinting (in 1987) we expect to make no changes in the intent of the prefatory remarks.
Sierra Club	Interpretations of English sentences are usually context dependent, and goals are no exception. What will happen to the prefatory remarks of some of the goal sections which set the context for the goals?	We felt that the words "to the greatest extent possible" were vague and could not be defined. The degree of protection afforded could change according to how management interpreted "possible." The new language clarifies BLM responsibility: to preserve and protect, period, with no escape hatch.
Sierra Club	Although we applaud the effort to remove from the goals statements those which reflect proposed actions or methods for achieving the goals, however, some of the revisions of the goals are not simple restatements, but contain enormous policy changes. The document is totally inadequate to satisfy the NEPA requirements for full environmental analysis. The following are examples of policy changes found within the revised goals. A. Cultural <u>Original</u> - "Protect and preserve to the greatest extent possible a representative sample." <u>Revised</u> - "Preserve and protect a representative sample."	
Sierra Club	<u>Original</u> - "Manage cultural and paleontological resources so that their scientific and socio-cultural values are maintained and enhanced." <u>Revised</u> - Missing.	Cultural and paleontological resources were grouped together in the original Desert Plan, despite the vast differences in resources and major differences in legal mandates and policy. Over the years since 1980, paleontological resources have been assigned a secondary

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Sierra Club	<p><u>Original</u> - "Achieve proper data recovery where adverse impacts cannot be avoided."</p> <p><u>Revised</u> - "Ensure proper data recovery of significant (National Register quality) cultural resources where adverse impacts cannot be avoided."</p>	<p>position to cultural resources, in part due to a failure to recognize paleontology as a discrete area of concern. More recently, these resources have received greater publicity requiring Bureau action.</p> <p>Paleontological resources are not "missing." We have created a whole new element, or a sub-element, to accord them a status in keeping with their sensitivity as an important resource. Minor differences in language between cultural and paleontological resources are due to differences in legal authorities and policy.</p> <p>In accordance with 36 CFR 60.4(d), properties which retain important data for the interpretation of history and pre-history are eligible for inclusion on the National Register. By inference, ineligible properties do not retain these values. Bureau policy has been to either avoid impacts to National Register quality properties or to mitigate unavoidable impacts to these properties, wherever possible, through data recovery. Fiscal and practical constraints preclude extending a policy of data recovery to ineligible properties where data values are defined as low. All properties are thoroughly documented during required Determination of Eligibility. No properties are sacrificed or "written off."</p>
Sierra Club	<p>B. Wildlife</p> <p><u>Original</u> - "Consider the habitat of all fish and wildlife in implementing the Plan" "Each habitat will be large enough and managed in such a way as to retain viability and integrity of the natural system."</p> <p><u>Revised</u> - "promote general wildlife population through habitat enhancement projects such that balanced ecosystems are maintain and wildlife abundance provides for human enjoyment."</p>	<p>Goal 3 of the original wildlife element referred to "species with high public visibility (raptors, game birds, some fur bearers, commercially valuable reptiles). . . ." This has been generalized as "human enjoyment" which would include many other aspects such as nature photography and observation of such species as desert tortoise and bighorn sheep. Rather than refer to these species in a vague reference, the newly stated goal more specifically states that general wildlife is being promoted and gives two basic reasons - the maintenance of balanced ecosystems and the providing of wildlife abundance for people to enjoy in a wide variety of ways. We believe the goal as stated correctly portrays the worthy goal of promoting general (as distinct from unusual or "listed") wildlife populations and habitat.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Sierra Club	<p>C. Vegetation Original - "... avoid the long-term and short-term impacts associated with the destruction, loss or degradation of wetland and riparian areas;</p> <p>...preserve and enhance the natural and beneficial values of wetland and riparian areas which may include constraining or excluding those uses that cause significant long-term ecological damage.</p> <p>...include practical measure to minimize harm in all actions causing adverse impacts on wetland and riparian areas and</p> <p>...retain all wetlands and riparian habitats presently under BLM administration where high resource values exist and adverse impacts cannot be mitigated.</p> <p>Revised - There is no mention of wetlands or riparian area protection in any of the new goals nor any inference to them or their protection. New goals mention meeting "consumptive needs of ..livestock," manage endangered species, sensitive species and unusual plant assemblages. Nor is it mentioned in any other element.</p>	<p>Since wetland and riparian areas are included as unusual plant assemblages it was believed that these areas were adequately treated in the newly stated Goal 4. However, further consideration reveals that the original Goal 3 was much stronger and more specific with regard to the management of riparian and wetland areas. Furthermore, the high public and Bureau commitment to wetland and riparian areas warrants specific statement in the goals. Therefore, the original Goal 3 is reinstated as originally written and is listed as Goal 5. Former Goal 5 becomes Goal 6 (See Chapter 4). Note that newly stated Goal 2 of the wildlife element calls for the development and implementation of detailed plans for several types of areas. Riparian and wetland areas would certainly be included as "(a) areas which contain rare or unique habitat," "(b) areas with habitat which is sensitive to conflicting uses," and "(c) areas with habitat which is especially rich in wildlife abundance or diversity." The original goal in the wildlife element referred to "sensitive habitats" and gave examples (including riparian areas and wetlands). Examples are not necessary in a goal and may even serve to restrict the scope of the goal, but we believe that riparian and wetland areas are definitely included in the wildlife element.</p>
Sierra Club	<p>D. Livestock Grazing Original - "Those lands in poor to fair condition will be improved by the application of appropriate management prescriptions...." Revised - "...improve poor and fair range condition by one condition class, through development and implementation of feasible grazing systems or allotment management plans. Adjust livestock use where monitoring data indicate changes are necessary to meet resource objectives."</p>	<p>Those lands in poor and fair range condition have been identified. The Bureau's intent is to improve the condition by one condition class; that goal is obtainable within the life of the California Desert Plan. That does not necessarily place a limit on the effort to further improve range condition.</p>

TABLE 3-1
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COMMENTER	COMMENT	RESPONSE
Sierra Club	"Feasible grazing systems" is a new term. What does it mean? Which resource objectives are being considered?	The phrase "feasible grazing systems" refers to specific management efforts intended to maintain or improve vegetative condition on allotments of lower management priority; e.g., M (maintain) and C (custodial) priority allotments. Maintenance or improvement of vegetative condition is achieved through technically and economically feasible grazing prescriptions.
Sierra Club	E. Recreation <u>Original</u> - "Provide for a wide range of opportunities within resource capabilities..." <u>Revised</u> - "Provide for a wide range of quality recreation opportunities and experiences emphasizing dispersed undeveloped use."	The newly-stated goal provides more specific management direction by pointing out the Bureau's emphasis on dispersed undeveloped use as contrasted to a multitude of organized campgrounds. This is a long-time Bureau policy and one highly approved by most desert recreationists.
Sierra Club	<u>Original</u> - "Provide recreational management and facilities consistent with sound visitor and resource protection practices with emphasis on conserving desert resources that have special scenic, historic, scientific, or recreational values." <u>Revised</u> - "Emphasize the use of public information and education techniques to increase public awareness, enjoyment and sensitive desert of (sic) desert resources." <u>Revised</u> - "Provide a minimum of recreation facilities with emphasis on resource protection and visitor safety."	The revised goals which were intended to replace this original goal were: "Provide a minimum of recreation facilities, with emphasis on resource protection and visitor safety" (revised Goal 2) and "Manage recreation use to minimize user conflicts, provide a safe recreation environment, and protect important desert resources" (revised Goal 3). Both of these goals have as objectives the protection of resource values - one focuses on facility development and one focuses on recreation management. The new goals distinguish between those two important aspects of the recreation program.
Sierra Club	<u>Original</u> - "Monitor and evaluate visitor use and preferences and adjust Bureau program to meet changing needs where appropriate." <u>Revised</u> - "Adjust management approach as appropriate to accommodate changing visitor use patterns and preferences."	Both the original and the revised goals discuss the need for monitoring visitor use and the resultant need for changes. The revised goal places the emphasis on adjustment of the management program where appropriate, rather than on the monitoring process.
Sierra Club	G. Motorized Vehicle Recreation <u>Original</u> - "...avoid or minimize damage or degradation of the natural cultural, and aesthetic values of the Desert." <u>Revised</u> - "When designating or amending areas or routes for motorized vehicle access, to the degree possible, avoid adverse impacts to desert resources."	It should be kept in mind that the overall goal of this element is to provide vehicle access, not to protect resources. However, the Bureau wants to provide access in a manner that minimizes adverse impacts to resource values. Therefore, the original Goal 1 was revised to the proposed Goal 2. Both, however, emphasize access while promoting the avoidance of adverse impacts.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Sierra Club	<p><u>Original</u> - "... provide a reasonable network of "routes of travel" which meets the needs of desert users..."</p> <p><u>Revised</u> - "Provide for constrained Motorized vehicle access in a manner that balances the needs of all desert users, private landowners and other public agencies."</p> <p><u>Revised</u> - "Use maps and published information to communicate..."</p> <p>Missing is any mention of compliance.</p>	<p>The revised goal, by using the terms "constrained" and "balances" is more protective than the original goal.</p> <p>The intent of the revised goal (No. 3) was to emphasize public information as a means of communicating with desert vehicle users. It was designed to consolidate the intent of the original Goal 4.</p> <p>Compliance is assumed to be a part of all programs in which restrictions on use apply. Therefore, it was not specifically mentioned in the goals, nor was it included in the original goals.</p>
Sierra Club	<p>G. Geology, Energy and Mineral Resources</p> <p><u>Original</u> - "...to simultaneously enhance the productive potential of G-E-M resources and the quality of the environment."</p> <p><u>Revised</u> - "Assure the availability of known mineral resource lands for mineral exploration and development."</p> <p><u>Revised</u> - "Foster and encourage orderly and economic development of mineral resources."</p> <p><u>Revised</u> - "Assure mineral resource input to planning, recognizing concurrent or sequential use."</p> <p>There are no original corresponding goals. The intent is not clear since there is no context for these revisions.</p> <p>Missing is any goal regarding environmentally sound mining practices, protection of other resources, or any clear language relating to clean-up and restoration after mineral resources have been extracted.</p>	<p>The goals for the Geology-Energy-Mineral Resources Element proposed in the DEIS have been revised (please see Chapter 4). Revised Goal 2 addresses your concerns about reclamation and the quality of the environment. It states: "Encourage the development of mineral resources in a manner that satisfies national and local needs and provides for economically and environmentally sound exploration, extraction and reclamation practices."</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Sierra Club	<p>H. Land Tenure Original - "Establish a program for land conveyance that will provide for stable and beneficial patterns of public and private land use." Revised - "Initiate a program for the conveyance of public land through sale and exchange within the "Unclassified" areas of the CDCA to reduce inefficient management of isolated and fragmented parcels."</p>	<p>This goal refers to "unclassified" scattered and interspersed public lands usually located within close proximity to urban and agricultural areas. These parcels are difficult to manage because of their location and market value. They provide opportunities for acquisition of private inholdings through exchange. This goal, in combination with Goal One, supports the Bureau's effort in seeking to block up public land ownership within critical areas, e.g. ACECs, WSAs, and intensively use recreation areas.</p>
National Res. Defense Council,	<p>AMENDMENT 7</p> <p>Moreover, notwithstanding the claim that "the Bureau never intended that ... designation (of the FMNSA) would conflict with development of the community of Baker," id., the fact is the EIS contains absolutely no evidence that there is any present conflict or even that Baker is in need of additional lands.</p>	<p>The statement on p. 4-35 that "land availability is major hindrance to growth and development in Baker" indicates that the community is looking toward growth and development in the future.</p>
Ted Rado	<p>I was also concerned with misleading statements applied in this text. I wish to address two examples. Example 1: "Development in the Baker area beyond the projected unclassified boundary would be limited temporarily by the presence of Wilderness Study Areas 243 and 228. However, it is highly likely that Congress would make its decision on these non-recommended WSA's long before this land is need for urban use." This text strongly implies to the reader that the ultimate decision to reject these WSAs is a formality, when this is not the case. Congress is entirely free to act independently of any BLM recommendations regarding wilderness suitability. A decision to change land classification within this area also seems premature until such time as Congress has decided the wilderness issue.</p>	<p>The needs of communities such as Baker are given consideration by Congress when making decisions about wilderness areas.</p>

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COMMENTER	COMMENT	RESPONSE
Ted Rado	(The text states) "Developments may impair the view from I-15 looking east and south from Baker. However, it is likely that new developments in this already impacted site would be less intrusive than they would be in the more pristine areas within the EMNSA." The unequivocal fact is that development of any kind will intrude upon the scenic quality of this area. Whether the level of visual degradation is equal to or greater than that of other portions of the EMNSA is totally outside of the scope of this amendment.	It is true that development will intrude on scenic quality. Accordingly, we have changed our preferred alternative to alternative D, that is, rejection of the amendment. However, we still maintain that new developments in areas with similar structures are significantly less intrusive that if located in an undeveloped area.
Riverside County Planning Department	<u>AMENDMENT 8</u> Section 10, T4S, R6E, is located within the area designated "Areas to be Reserved" by the Coachella Valley Fringe-Toed Lizard Habitat Conservation Plan (June, 1985). Because of this, the classification for this area should be Multiple Use Class C (Closed). However, based on discussion held with your department, Class C is only used for wilderness areas. Based on this assumption the proposed classification of Class L should be satisfactory. This classification should limit the amount of development in this area, thereby protecting the Coachella Valley Fringe-Toed Lizard. Any uses proposed in this area should be reviewed in light of the Habitat Conservation Plan to screen out undesirable or incompatible uses.	The Bureau was a participant in the development of the Habitat Conservation Plan and intends to follow its recommendations for protection of the CVFTL.
Riverside County Planning Department	<u>AMENDMENT 9</u> The classification of the lands in question should provide a better idea as to the uses permitted within the area. However, the uses permitted in this class may not be conducive to the protection of the Coachella Valley Fringe-Toed Lizard (CVFTL). In order to protect the species, the Habitat Conservation Plan for the CVFTL should be used to screen out undesirable and incompatible uses.	See preceding response

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COMMENTER	COMMENT	RESPONSE
Metropolitan Water District	Land reclassifications proposed by this amendment would place more restrictive access limitations on several parcels of land which directly adjoin our CRA. Specifically, these parcels occur in the following townships: T 3S, R 6E; T 3S, R 7E; T 4S, R 7E. The map provided in the draft EIS does not have sufficient detail to determine the extent of these potential impacts. The text does not discuss Metropolitan's right-of-way for the CRA. We are concerned that such potential impacts may not have been taken into account.	The right-of-way for the Colorado River Aqueduct is adjacent to the parcels in T3S, R6E, and T3S, R7E, and passes directly through Section 6 of T3S, R8E. A recheck of our land use map showed that this particular section and Section 4, T3S, R8E, were already classified as "L". The map has been corrected. A Class L designation would not affect use of the right-of-way.
USDI, Fish & Wildlife Service, Ted Rado	<u>AMENDMENT 10</u> The reclassification of portions of the Panamint range from Multiple Use Class L to Class M could indirectly adversely affect several populations of the Panamint alligator lizard (<i>Elgaria panamintinus</i>), a category 2 candidate species (50 FR 37962). The species is restricted to isolated mesic canyon habitats within a limited area in Inyo and Mono Counties. Land classification change could seriously affect this species by subsequent increases in human-related uses that may impact these habitats. Given the stated policy of the BLM to take no actions that could contribute to the eventual Federal listing of candidate species, we recommend that Amendment 10 be rejected.	The Bureau's preferred alternative is to reject Amendment 10 because of the potential for increased impact to wildlife resources if the multiple use classification were changed from "L" to "M." There is sufficient information to conclude that relaxing the regulatory requirements for mining operations under five acres in size could result in habitat alteration and impact to species such as the Panamint alligator lizard, as well as the other species identified in the DEIS.
Audubon Society, Yuma, AZ	<u>AMENDMENT 12</u> We have no objection to adoption of this proposal as long as the lands are exchanged rather than sold.	Exchange is considered a higher priority. When exchange appears not feasible, then sale opportunities are sought.
Pacific Gas and Electric Co	<u>AMENDMENT 13A. Clark Mountain ACEC</u> We question, however, the wisdom of Amendment 13a. Specifically the northward extension of the Clark Mountain ACEC (No. 19) into Utility corridor "D," which has a width of 2 miles. What is the planned relationship between the ACEC, Corridor "D," and the	The ACEC designation is intended to focus management attention on areas with significant resources and/or resource-use conflicts. A decision to keep such areas out of ACECs would undermine the main purpose of such a designation. In this instance, the boundary of

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Los Angeles Department of Water and Power	existing 287 kV and 500 kV electric transmission lines? Although these are not PG and E facilities, in the interest of avoiding potential land use conflicts, we suggest that the northern limit of the Clark Mountain ACEC be kept south of the existing transmission lines-preferably no closer than 2,000 feet except in the area of Kearny Pass.	Clark Mountain ACEC is proposed for expansion to the north to include habitat for a sensitive plant species that happens to lie in a developing utility corridor. The ACEC plan recognizes the corridor as an existing use that will continue and also states that, "Uses considered to be inconsistent with the ACEC's management goals include... expansion outside of existing utility corridors" (p. 19, USDI 1985; emphasis added.) The final management plan for the ACEC does not include any new constraints on development of corridor "D" to the north, or corridor "BB" on the southeast corner of the adjusted ACEC boundary.
Los Angeles Department of Water and Power	The northern boundary shift near Kearny Pass includes the addition of 3000 acres and encompasses the existing Boulder Transmission Line Corridor. The Los Angeles Department of Water and Power (DWP) believes that the existing 2-mile-wide utility corridor through this area (Corridor D in the California Desert Plan) should be acknowledged, and utility routing to allow separation to the north or south from the existing transmission lines through this area should not be restricted.	See preceding response.
Metropolitan Water District	DWP also recommends a shift of the southeast corner boundary (T16N, R13E, Section 3) to include only the northern half of Section 3 in the ACEC. It would minimize the distance that Southern Californian Edison Company's existing 138-kV transmission line, as well as future transmission facilities, would cross through the ACEC. This would still facilitate the ease of legal description by the Bureau of Land Management which appears to be the intent of this particular boundary change. <u>AMENDMENT 13D. Plank Road ACEC</u>	The Bureau of Reclamation is aware of the Plank Road ACEC. There should be no conflicts, since the major portion of the remaining Plank Road lies far south of the current All American Canal near

TABLE 3-1
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COMMENTER	COMMENT	RESPONSE
	Drop 1. This section of the AAC is currently being studied by the Bureau of Reclamation for possible concrete lining. Metropolitan is concerned that this proposal may interfere with potential construction and conservation measures along the AOC. This proposal should be discussed with the Bureau of Reclamation.	Gray's Well. BUREC did not comment on this amendment, and the amendment does not appear to be an issue with them.
	<u>AMENDMENT 15</u>	
A.J. Borrie, III Nation Resources Defense Council Citizens for Mojave National Park	Land management planning is particularly difficult in areas were scattered parcels of private land are surrounded by public lands possessing unusual resource values, such as the FMNSA. Reclassification of all unclassified lands in this important region to Class L seems the most logical alternative. Although leaving small parcels of land unclassified for the purpose of trading for more sensitive areas sounds laudable, there is no guarantee that such opportunities will arise. The best approach in this instance would be to provide protection for the maximum amount of acreage. If requirements change in the future, new plan actions may be undertaken at that time.	Your comment is noted.
	<u>AMENDMENT 16</u>	
Sierra Club	According to the Desert Plan the dunes are one of the few truly unstable dunes systems in the state. The dunes contain pockets of water after rain storms, and support a larger wildlife population than one might expect on a dune system. Wildflower displays last long past the usual season. Vegetation has just become reestablished on the dunes following closure almost 10 years ago. The unstable system is not clearly understood, and is still being studied. Opening would impair these studies.	If a decision is made to open all or part of the dunes, on-going research activities will be considered during the development of a management plan for the area.

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COMMENTER	COMMENT	RESPONSE
California Department of Fish and Game	<p>The department is opposed to opening more dune ecosystems for off-road vehicle (ORV) use and therefore opposes the BLM's selection of Alternative A. These environments are fragile, and ORV use is destructive of many elements within them. The discussion of environmental consequences for this amendment in the DEIS for the 1985 Plan amendments (pg. 4-53 to 4-55) is based on the assumption that the dunes will be closed between March 1 and September 1. That restriction is apparently not part of the proposed amendment, nor is it discussed elsewhere in the DEIR. If this restriction is not included in the amendment, then the discussion of environmental consequences greatly misrepresents the potential impact of ORV's on the flora and fauna of this dune system. The Final EIS should clarify this situation by either adding the restriction to the amendment or discussing the impacts of year-around ORV use on the dunes flora and fauna.</p>	<p>The seasonal closure is already a part of the amendment. See page 2-27 of the DEIS.</p>
California Department of Fish and Game	<p>A large part of the justification for this amendment appears to be that the Rice Dunes, currently designated "Open", are unpopular with ORV users and consequently are little used. If this is true, in light of the inherent damage, there seems to be little justification for retaining the Rice Dunes in an "Open" category. Perhaps it would be in order for the preferred amendment to include a provision for closing the Rice Dunes to ORV use.</p>	<p>A proposal to clarify or change the ORV designation for sand dunes in Riverside County may be considered as a 1987 Desert Plan amendment.</p>
A.J. Borrie III	<p>Cadiz Dunes is an important scenic and natural resource. It deserves greater protection than it currently receives. Opening any acreage in this area to ORV interests amounts to nothing more than acquiescence to political pressure, without regard for the protection of nationally significant resources, as mandated by the CDCA Plan.</p> <p>Full closure of this area would lessen the work required of the</p>	<p>Some ORV groups have expressed an interest in entering into a Cooperative Management Agreement with BLM to help install and maintain a fence or other barrier, monitor use in the area, and put in whatever signing is necessary should the area be opened to ORVs. There would still be the need for a BLM law enforcement presence, but not significantly greater than is already provided. A seasonal closure would be relatively easy to enforce, considering the normally light use the dunes receive during the warmer periods of the year.</p>

TABLE 3-1
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COMMENTER	COMMENT	RESPONSE
	<p>Desert Rangers in the long run. While increased enforcement presence would be expected initially, the need would diminish. If the area were opened, continuous enforcement presence would be required, much as with the Imperial Dunes situation. The Bureau is currently too underfunded to consider committing scarce resources for single purpose users, in this case, dirt-bikers and ATV riders.</p> <p>Alternative C should be the preferred solution to this amendment.</p>	
Ted Rado	<p>I advocate acceptance of alternative C, complete closure of the Cadiz Dunes to motorized vehicle use. I seriously question the statement made on page 4-53 of the DEIS, that "Seasonal closure of the open area could substantially offset ORV-related effects on vegetation and wildlife by protecting annual plant production and limiting intrusive use during wildlife breeding and rearing season." The statement is totally unsubstantiated in the face of numerous literature sources to the contrary which document substantial, sustained, impacts to wildlife from ORV use. This form of recreation is typically seasonal in any event, with little actual use during late spring and summer months. The limited law enforcement personnel available to the BLM would preclude any effective seasonal closure of the dunes. This state in the DEIS also leaves this reader wondering just how wildlife species, in the face of removal of "a significant portion of the area's perennial vegetation," will survive in the dune system during the remaining portion of the year (roughly 6-9 months) when annual plant production is virtually zero.</p>	<p>The statement, "Seasonal closure of the open area could substantially offset ORV-related effects on vegetation and wildlife life..." should be modified by omitting the word substantially. Although a seasonal closure may offset ORV-related impacts to vegetation and wildlife, what actually might occur is a slowdown in the loss of vegetation and wildlife habitat.</p> <p>While it is true that numerous literature sources document substantial, sustained impacts to wildlife and/or wildlife habitat from ORV use, the vast majority of these studies deal with areas receiving heavy indiscriminate ORV use. It is unlikely the Cadiz Dunes will receive heavy use. Nevertheless, it is true a seasonal opening of these dunes will lead to a certain amount of habitat degradation. The decline of one or more resources often is the inevitable outcome of multiple use and is a consideration taken into account when competing values are weighed during the decision-making process.</p>
Ted Rado	<p>I request that the Bureau specify in the final EIS and ROD what actions it plans to take to effectively protect biological resources in this area while allowing for recognized intensive incompatible uses.</p>	<p>The only way to effectively protect the biological resource of the Cadiz Dunes from ORV-related impacts would be to close the dunes (Alternative C) or maintain the ambiguous status quo (Alternative D). If some portion of the dunes are opened to seasonal ORV use,</p>

TABLE 3-1
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COMMENTER	COMMENT	RESPONSE
California 4 WD Clubs	<p>Alternative A's plan to keep some 5,000 acres of the dunes closed violates established Bureau policy. Although the Draft claims (Vol. 2, p4-54) that proposed boundaries would be easily identifiable and managed, the Desert Plan Vehicle Access Element mentioned on p3-42 directs that the Bureau not perpetuate bifurcation of dunes systems because of the inherent difficulty of defining boundaries, defining routes of travel, and management enforcement problems.</p>	<p>the Bureau can periodically monitor the status of resources at risk and perhaps impose additional restrictions if warranted. However, in any decision that would open the dunes to ORV use, the Bureau is acknowledging and accepting the fact that negative impacts will occur to biological resources.</p> <p>The Desert Plan's Vehicle Access Element contains no recommendation against division of Dunes into open and closed areas. It does make the point that a "designated" or "existing" route of travel in a sand dune area makes little sense. It is this current limited-use designation that the amendment was designed to clarify.</p>
California 4 WD Clubs	<p>The balance Alternative A attempts to provide with non-ORV users is illusory. Hikers and photographers and other commercial users would be granted exclusive access to the highest dunes to...look down on ORV users! Further, their interests are well and adequately protected under the seasonal closure used in conjunction with Alternative B. According to comments in Vol 2, p4-53 of the EIS, the March 1st through September 1st closure coincides with the "wildlife breeding and rearing seasons" and vegetation which is "growing primarily in the spring months, although summer annuals may be present." These are the quality, prime scenic opportunities non-ORV users want, and they will occur after the closure is in effect when their access to the dunes is not only still permissible, but realistic since the ORV's won't be there. Therefore all recreational uses can be adequately satisfied under Alternative B.</p>	<p>Use preferences of ORV users of the Cadiz Dunes are evenly split between the north "high dunes" and the larger expanse of low dunes to the south, with perhaps a slight preference for the south due to the variety of terrain. On the other hand, users wanting a non-ORV experience, including photographers, have an almost exclusive preference for the more scenic high dunes.</p>

TABLE 3-1
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COMMENTER	COMMENT	RESPONSE
California 4 WD Clubs	The "dune split" proposed in Alternative A does little to promote vegetation protection while Alternative B would implicitly do just that. The closed area has the least vegetation due to the nature of the dunes themselves. If the high, "barren unstable slopes" (Vol 2, p3-43EIS) were open under Alternative B, users would tend naturally to gravitate towards them, leaving the more vegetated areas less traveled and thereby better protected overall.	Vegetation cover was one of many variables considered during the formulation of the alternatives for this amendment. See preceding response.
High Desert High Rollers	<p>We totally concur with the recommendation to adopt Alternative B. We feel Alternative B. best protects, and serves all concerned including the Bureau of Land Management.</p> <p>In regard to the seasonal closure of the Cadiz Area, we would like to see a change from the proposed March 1 to September 1 closure. We feel that for O.R.V. use closure at the end of April immediately following Easter week would still preserve and offset the biological impact on the area. Indeed a closure from after Easter week until October 1 would be considered more suitable for O.R.V. use by our group. Although Labor Day Weekend is considered by many a prime weekend for O.R.V. use, we feel the possibility of high temperatures in the area make the Easter availability of the Dunes more attractive.</p>	<p>Plant growth in the Cadiz Dunes may begin as early as January or February. Keeping the dunes open past March 1 would certainly interfere with recovery of this resource. Closure before March 1 would prohibit ORV use on President's Day weekend, one of the three heaviest use periods in the California Desert. The March 1 date was considered a reasonable compromise date, and will not be altered. Since Labor Day is the first Monday in September, altering the beginning of the open season to the beginning of Labor Day weekend would have no effect on biological resources, since plant and wildlife activity dies down considerably after July. The amendment has been changed accordingly.</p>
California 4 WD Clubs	Alternative B is the most practical in terms of implementing. The EIS correctly notes that signing and monitoring cost will be the lowest in a time when Bureau resources in money and manpower are severely constrained. Having already structured the seasonal closure around the holidays when the use is the highest, it is already quite workable, and could only be improved by pushing the reopening date back two or three days to secure the Labor Day weekend for legal use.	See preceding response.
California 4 WD Clubs	Finally, without meaning to disparage the writers of the draft, there are a few references to ORV use that are only half correct. At Vol 2, p3-42 the writers comment that present use of	Even when a portion of the Cadiz Dunes had been designated open in the 1970s, ORV use was very light. "Hard surface access" was intended to refer to access for campers; although roads exist in the

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>the dunes is "extremely light." This is only because of a lack of adequate notice or other form of posting by the Bureau to ensure users that they would not be violating a closure. The Draft also states there is a "lack of hard surface access" (Vol. 2 p3-43) while in the very next paragraph, under minerals, states there are roads in the area, which are also shown on the reference map 3, referred to at Vol. 2, 3-4. And again, the "concentration" of use "near Kilbeck Hill" is more reflective of ambiguous management than any user preference.</p>	<p>area, many are suitable only for four-wheel drive or ATCs and not for primary vehicles such as RVs or two-wheel drive trucks. Contacts with most ORV users of the dunes over the past several years indicates a slight user preference for the Kilbeck Hills area.</p>
California Department of Fish and Game (CAF&G) No.1	<p><u>AMENDMENT 17</u></p> <p>The 1985 Draft EIS for Plan Amendments states, "Cattle occasionally range beyond the boundaries of the grazing allotment into bighorn habitat in the Clipper Mountains." We have documented the regular occurrence of cattle in sheep habitat, as well as the recent presence of cattle in the Marble Mountains. It is apparent that the presence of cattle in sheep habitat is more than "occasional". The DEIS also discusses the presence of viral diseases in the nearby mountain ranges where cattle are present but a near absence of such diseases in nearby ranges without cattle. The presence of cattle in the Old Woman Mountains, which support a low density sheep population, corresponds with a high rate of infectious, livestock-associated diseases among bighorn sheep in that range and a population of bighorn sheep which is much smaller than would normally be expected (Wehausen and Hansen 1986). In contrast, the Marble Mountains has a thriving population of bighorn sheep and (until recently) no livestock (V.C. Bleich, unpubl. data). This inverse relationship between livestock-associated diseases and relative bighorn sheep abundance persists throughout the desert range surveyed by Clark et al. (1985) but is especially well documented in the Old Woman Mountains (Wehausen and Hansen 1986) and in the Marble Mountains (V.C. Bleich, unpubl. data), ranges adjacent to the Clipper Mountains.</p>	<p>Comment noted. Cattle outside of the Colton Hills Allotment boundary may be originating from another allotment (Granite Mountain) or from the many private parcels leased for grazing; redoubled efforts are planned to reduce trespass on public land in the area.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
CAF&G No. 2	<p>The Bureau had intended to evaluate the impacts of livestock grazing on bighorn sheep over a large portion of the Mojave Desert (Desert Plan 1980, page 32) but, to date, has made little, if any, progress along those lines. In 1984 the Department of Fish and Game initiated an effort to evaluate just those effects, specifically in the Old Woman Mountains, and to compare the demography of the population with that in an ungrazed range, the Marble Mountains. To date, the Department has invested nearly \$100,000 in that research. Not surprisingly, the most tenable hypothesis to arise is that livestock-associated diseases are depressing the population in the Old Woman Mountains. Because the Clipper Mountains are adjacent to the Marble Mountains, and cattle are now entering the Marble Mountains, the whole research design for the investigation is threatened. The continued presence of cattle in the Clipper Mountains threatens to destroy any opportunity to elucidate the effects of livestock on bighorn sheep.</p> <p>It seems untenable that the Bureau would not honor its decision to remove livestock from bighorn sheep ranges south of I-40, particularly when the Bureau has, to date, not begun the extensive studies on livestock/bighorn sheep interrelationships which were outlined in the Desert Plan (page 32). Additionally, the Bureau's commitment to evaluate the effects of livestock on bighorn sheep in the Old Woman Mountains (BLM Desert Plan Amendment 81-21) cannot be (and has not been) effectively implemented without a control population for comparative purposes. The Marble Mountains currently are serving as a control for the Old Woman Mountains research being conducted by University of California personnel and funded by the Department of Fish and Game. That research will be hindered drastically if cattle from the Clipper Mountains continue to have access to the Marble Mountains.</p>	<p>The Desert District recognizes the need for and fully supports the maintenance of control populations for sheep for research. See response to No. 1 above.</p>
CAF&G No. 3	<p>The BLM Desert Plan (page 32) acknowledges the potential for livestock impacts on bighorn sheep and states, "if livestock grazing is found to have negative impacts on the bighorn sheep and grazing</p>	<p>We strongly support the policy you've quoted. As you state, the evidence that livestock-associated diseases are affecting bighorn in the Clippers is circumstantial. Although we plan to eliminate</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>threatens the health and viability of herds, then change will be made in grazing allotments so that healthy, viable herds of bighorn can continue to exist in this region."</p> <p>The amount of circumstantial evidence implicating livestock-associated diseases with depressed populations of bighorn sheep throughout the Mojave Desert (Clark et. al. 1985; Wehausen and Hansen 1986) is substantial. Furthermore, two nearby, thriving populations (Marble Mountains and Old Dad Peak (V.C. Bleich 1983) without livestock diseases have expanded dramatically since 1970.</p>	<p>grazing south of I-40 in this allotment, as a safety measure, we believe that local cattle should be studied to determine whether they carry the disease. The BLM will continue to seek funding for this work.</p>
CAF&G 1 No. 4 41	<p>The Colton Hills Allotment Management Plan (AMP) acknowledges the presence of bighorn sheep south of I-40 (page 34) and also acknowledges the goal of "stabilizing bighorn sheep numbers while management learns more about herd viability . . ." Available evidence (Clark et. al. 1985) clearly suggests that the continued presence of livestock in the Clipper Mountains is having a negative impact on bighorn sheep populations.</p> <p>In view of the above, we urge the elimination of that portion of the Colton Hills Allotment south of I-40. That action would be in keeping with the objectives outlined in the AMP.</p>	<p>Comment noted. See preceding response.</p>
CAF&G No. 5	<p>The Draft EIS for 1985 Plan Amendments (page 2-11) states, "Livestock use is the historic use in this area." In view of the numerous BLM commitments cited above, the rationale of "historic use" in support of the decision does not stand scrutiny.</p>	<p>The preferred alternative has been changed to Alternative A, in recognition of the fact that wildlife considerations outweigh the historical use of this area for grazing as factors to be considered in determining the best use for this area.</p>
CAF&G No. 6	<p>The Bureau is directed "to manage the public lands so as to prevent deterioration of sensitive species habitat . . ." (CSO IM CA-82-190). The decision to not remove livestock from the Clipper Mountains (south of I-40) appears to be in direct conflict with that directive, particularly when all available evidence is considered.</p>	<p>As stated earlier, there is presently no conclusive evidence that livestock from the Colton Hills herd are the source of disease in bighorn sheep in the Clipper Mountains. To assure that this potential problem does not occur here, we have changed the preferred alternative to Alternative A. Potential competition between livestock</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
CAF&G No.7	The 1985 Draft EIS acknowledges the potential impacts of livestock on bighorn sheep in the form of introduced diseases and acknowledges the potential decline of this population as a result of livestock impacts (page 4-57).	and bighorn sheep will be avoided, and the economic impact on the operator will be minimal. See revised section on Wildlife for Alternative C, p. 4-57, in which it is stated that the spread of disease is questionable, since there is no clear evidence that livestock using the clippers are infected.
CAF&G No.8	The 1985 Draft EIS (page 4-56) acknowledges the potential benefits to bighorn sheep if livestock grazing is eliminated from the Colton Hills allotment south of I-40.	Comment noted.
CAF&G No.9	The 1985 Draft EIS (page 2-13) defends the preferred alternative by stating that cattle use "has been mitigated by providing additional water sources which serve both livestock and desert bighorn." This does not mitigate the impact we are concerned about because competition for water is not the issue. What is at issue is BLM's failure to accept amendments to improve conditions for bighorn sheep after having made the decision to improve conditions for bighorn sheep, specifically in areas south of I-40.	The preferred alternative has been changed to Alternative A.
CAF&G No.10	To date, the Bureau has expended approximately \$130,000 funding the Bighorn Research Institute (BRI), which concentrates on diseases as a factor limiting bighorn sheep populations (BLM Grant CA-950-GIS-1, 1985; BRI proposal to BLM, June 13, 1985). to date, the findings strongly implicate livestock diseases as the primary factor depressing lamb recruitment rates (BRI proposal to BLM, June 12, 1985), and in fact are probably more important in the relatively low lamb recruitment which has occurred in the Santa Rosa Mountains since 1977 Wehausen et. al., in press). It is ironic that the Bureau chooses to fund this work and yet chooses not to initiate management decisions which would be consistent with findings to date.	Please see response to CAF&G comment No. 3.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
CAF&G	<p>In the Desert Plan Record of Decision (page 22) Assistant Secretary for Land and Water resources approved the Bureau's recommendation that the Bureau "eliminate livestock on bighorn sheep ranges south of I-40" but added the provision that, "A specific effort should be made to mitigate the effect of these decision on any livestock operator whose operation will suffer major detriment."</p> <p>It is clear that no major detriment will be incurred by the permittee if grazing is eliminated from the Colton Hills Allotment south of I-40 because the permittee will suffer no loss of AUM's.</p>	<p>The detriment of the proposed amendment to the livestock operator is described in a revised section on livestock grazing for Alternative C (p. 4-12). We agree that the detriment is not major and have changed the preferred alternative in recognition of the importance of wildlife considerations.</p>
National Resources Defense Council 3 1 43	<p>Finally, we oppose the recommendation to reject amendment 17 which involves the Colton Hills Grazing Allotment. The proposed amendment would eliminate grazing south of I-40. Rejection is recommended on the ground that, when "the policy to prohibit grazing south of I-40 was established" in the Desert Plan, the Bureau intended it to apply only to certain areas and not to the Colton Hills Allotment. See EIS, p. 2-11. To date, I have been unable to document this alleged "intent" in either the Desert Plan or the EIS that accompanied it. In fact, the EIS clearly suggests that the Bureau then intended to eliminate all grazing south of I-40 in order to protect all bighorn populations in that area. See, e.g., FEIS, CDCA Plan, p. E-72. Finally, since rejection of this amendment is likely to harm bighorns, see Cf., EIS, p. 3-43, acceptance of this recommendation would conflict with the Bureau's policy on sensitive species and the goal of the Desert Plan that was discussed above. Accordingly, we urge adoption of Alternative A to amendment 17.</p>	<p>The preferred alternative has been changed to Alternative A.</p>
Ted Rado	<p>Contrary to the Bureau rationale for rejecting this amendment, I do not recall any intent by the Desert Plan wildlife staff to recommend this deletion of livestock grazing south of I-40 merely for "larger" ranges such as the Old Woman and Chemehuevi Mountains. The wildlife staff, to my knowledge, recommended this restriction to protect all bighorn populations south of I-40. If you will recall, I was a member of the Desert Plan wildlife staff at this point in time.</p>	<p>Comment noted.</p>

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<u>AMENDMENT 18</u>	
Jacqueline Wolff	Removing the Morongo Valley burros, all 5-10 strong, for the peace of mind and property values of the private landowners newly arrived in the area since the Desert Plan began? This is a waste of tax payers money, and would set a lousy precedent re any litigation you may (or may have incurred) incur. Next you will have to take care of the fire hazard that the presence of neighboring "brush" creates for these property owners, the marauding coyotes that hide out on public land, a deer or two that nibble on a garden shrub - if the deer don't exist, property owners of this ilk will invent them. This section of the amendment makes no sense whatsoever. These homeowners should be introduced to some sort of "hold harmless" clause on your behalf.	As stated in the rationale (Table 2-1 in the DEIS) there is a high percentage of private land in the herd management area. Although there is little conflict between the burros and the landowners at the present time, we foresee a substantial increase in such conflict as the herd multiplies in the coming years. Confining a larger herd to public lands could become a difficult management problem. Therefore, we proposed removing the burros while the herd is still small.
Harriet Allen	Amendment 18-b should contain language restricting removal activities to comply with Anza-Borrego Desert State Park bighorn sheep protection schedules. Amendment may be expanded to address feral and cat-tle trespass.	The Bureau's standard practice is to coordinate with all adjacent land management agencies prior to conducting a burro removal program. The Anza-Borrego State Park management will be consulted.

CHAPTER IV

MODIFICATIONS AND CORRECTIONS

CHAPTER IV

MODIFICATIONS AND CORRECTIONS

Chapter S (Summary), p. S-3, Table S-1 (Summary of Impacts): Change impacts for Amendments 1, 12, 14, 15, and 17.

Chapter 2, p. 2-14, Amendment 1: Following paragraph 3, add a new paragraph:

The Cooperative Agreement (and this plan amendment) does not propose an increase in current military operations in the study area. If an increase were needed in the future, an EIS would be required. Currently, the study areas on the West Mesa and the East Mesa provide protected areas for tactical air training, pilot training, fleet readiness training, and initial ordnance training. Target areas are used for air-to-ground high, intermediate, and low level bombing and rocket practice on stationary and moving targets, strafing, parachute drops, and survival training. Additional information on activities in the RSZs is given in Section IV of the Cooperative Agreement (Appendix E) and in the DEIS on Land Acquisition and Management within Range Safety Zones R-2510 and R-2512 by the Naval Air Facility, El Centro. A detailed description of the Navy's mission in this area can be found in the Master Plan, Naval Air Facility, El Centro.

Chapter 2, p. 2-15, Amendment 1: On last line of paragraph 4, change Map 3 to Map 4.

Chapter 2, p. 2-16, Amendment 1: Table 2-2, add a column to describe Alternative E.

Chapter 2, p. 2-21, Amendment 1, Alternative B: In line 7, change (maps 7 and 8) to (maps 1 and 2).

Add the following sentence at end of paragraph: "Even in this event, an increase in military activities would require an EIS under NEPA.

Chapter 2, p. 2-26, Amendment 1: Add the following description of Alternative E.

Alternative E - Multiple Resources (West Side)

Introduction

The Multiple Use Classes in this alternative are a combination of those in Alternatives A and D. Alternative A primarily recognized the existing use patterns of the military and the recreation community. While these are fundamental uses of the lands on West Mesa, additional resources data, public input, and state and other agency input require a modification of the proposed action. These modifications are mandated by FLPMA, the National Historic Preservation Act of 1966, the Archaeological Resource Protection Act, the Sikes Act, the Endangered Species Act, and subsequent federal regulations and policies. The resulting modification of Alternative A incorporated aspects of Alternative D thereby combining acceptable portions from each. The result is Alternative E.

TABLE 2-2

BLM, Navy Cooperative Agreement: Summary of Changes in
Multiple Use Class and Vehicle Access Designations

	ALTERNATIVE				
	A	B	C	D	E
	Proposed Action	No Action	Maximum Use	Minimum Use	Multiple Resource
MULTIPLE USE CLASS CHANGES (Acres) - WEST SIDE					
Unclassified to I	27,780	0	48,260	8,000	13,290
Unclassified to L	40,740	0	20,260	60,520	56,110
M to L	3,920	0	3,920	4,710	3,920
M to I	1,120	0	1,120	330	1,120
I to L	500	0	0	500	500
I to Unclassified	1,280	0	1,280	1,280	1,280
M to Unclassified	1,540	0	1,540	1,540	1,540
VEHICLE ACCESS CHANGES (Acres) - WEST SIDE					
Undesignated to Limited	40,740	0	20,260	60,520	56,110
Open to Limited	500	0	0	500	500
Undesignated to Open	27,780	0	48,260	8,000	12,650
Open to Undesignated	1,280	0	1,280	1,280	1,280
Limited to Open	1,120	0	1,120	330	1,120
Limited to Undesignated	1,540	0	1,540	1,540	1,540
Withdrawn, managed as Open	240	0	1,320	70	1,320
MULTIPLE USE CLASS CHANGES (Acres) - EAST SIDE					
L to Unclassified	5,370	0	5,370	5,370	5,370
M to Unclassified	5,800	0	5,800	5,640	5,640
M to L	10,230	0	0	10,390	10,390
VEHICLE ACCESS CHANGES (Acres) - EAST SIDE					
Limited to Undesignated	9,400	0	9,400	9,240	9,240
Closed to Undesignated	1,760	0	1,760	1,760	1,760
Limited to Closed	10,230	0	0	10,360	10,360

Multiple Use Class Changes (Map 32)

Unclassified Navy Lease Lands to MUC L (56,110 acres): In Alternative E the area of MUC L would be increased southwest of the Superstition Mountains so that the total Class L acreage would be greater than in Alternative A but less than in Alternative D.

Initial approved routes of travel within MUC L are shown on Map 33. Specific needs for racing are recognized and can be planned for and managed under the existing procedures.

All MUC L boundaries are based on conflict resolution of competing uses as described elsewhere in this document.

Unclassified Navy Lease Lands to MUC I (13,290 acres): Total acreage in MUC I would be less than in Alternative A (13,290 compared to 27,780 acres). However, the MUC I area has been expanded in the Superstition Mountains and in the Mud Hills to provide for enforceability based on natural barriers and ground markings. Current recreational use patterns (as shown on Map 19) are provided for, while impacts to sensitive biological and archaeological resources are decreased.

MUC M to MUC L (3,920 acres): This acreage will remain as described in Alternative A.

MUC M to MUC I (1,120 acres): This acreage will remain as described in Alternative A.

MUC I to MUC L (500 acres): This acreage will remain as described in Alternative A.

MUC I to Unclassified (1,280 acres): This acreage will remain as described in Alternative A.

MUC M to Unclassified (1,540 acres): This acreage will remain as described in Alternative A.

Off Road Vehicle and Routes of Travel Decisions (Map 33)

Table 2-2 identifies vehicle access changes for Alternative E. Map 33 indicates those approved travel routes within Classes L and M. A detailed route inventory and route of travel review will be conducted on the Class L lands southwest of Superstition Mountain to determine additional access needs and route designations in that area. A competitive event course system, located to minimize resource impacts, will also be established through the route of travel process. The 640 acre Imperial Valley Rifle and Pistol Lease Area, which will be reclassified from MUC M to MUC I, will remain limited to approved routes of travel to control access for shooting range safety.

Open Area: Access and acreages are increased on the north and east sides in the Superstition Mountain and Mud Hills area due to public comment and management consideration. Conditions of use remain as described in Alternative A. Access and acreages are decreased on the south and west sides of Superstition Mountain in order to provide protection to sensitive, irreplaceable resources.

Closures: Access and acreages remain as defined in Alternative A; however acreage may increase on a site by basis as resource data becomes available.

Unclassified Lands: Access and acreages remain as defined in Alternative A.

Public Lands Outside the Navy Lease Area: Access and acreages remain as defined in Alternative A.

Wilderness: Wilderness Management actions will be identical to those of Alternative A.

Alternative E - Multiple Resources (East Side) All MUC (map 34) and route of travel designations (map 35) remain as in the proposed action Alternative A.

Chapter 2, p. 2-27. Amendment 16:

In second paragraph, change period of seasonal closure from "March 1 to September 1" to "March 1 to the start of Labor Day Weekend".

Chapter 2, p. 2-28, Table 2-4 (Summary of Impacts): See changes for Chapter S, Table S-1.

Chapter 3, p. 3-1. Final paragraph is revised to read:

The following tabular listing gives references on the affected environment for each of the amendments. This is followed by a supplementary section giving a more in-depth treatment of some, but not all, amendments, discussing major resource values which may be affected by the proposal.

Chapter 3, p. 3-20, third paragraph: In the last line, change (Map 14) to (Map 19).

Chapter 3, p. 3-40, Amendment 8: Add the following section:

Minerals

The land is classified as "prospectively valuable" for geothermal resources and has favorable lithology for sand and gravel resources as identified in CDCA Plan.

Chapter 3, p. 3-41, Amendment 9: Add the following section:

Minerals

Many of the land parcels are prospectively valuable for geothermal and speculative oil and gas resources. Sand and gravel resources are present or are expected to occur in several locations. Contracts for mineral materials exist for some of the lands.

Chapter 4, p. 4-2, Amendment 1: Revise paragraph 1 to read:

The Bureau cannot authorize actions which will result in impacts to significant cultural resources without first meeting the provisions of Section 106 of the National Historic Preservation Act (as amended). Consultation with

the State Historic Preservation Office (SHPO) is currently underway; a complete DEIS was provided on February 28, 1986. The consultation has followed the requirements of the Programmatic Memorandum of Agreement among the BLM, SHPO, and the Advisory Council on Historic Preservation. Full compliance with existing legislative mandates will be achieved prior to a final decision on this amendment. Appendix G contains additional information on the compliance process.

Chapter 4, p. 4-3, Amendment 1: Paragraph 1 is revised to read:

Lands within the RSZ A will continue to be impacted at the present levels. Adverse effects on very small areas include bombing and target maintenance as it occurs now. Specific new projects not covered by this analysis will be analyzed as proposed in the future.

Chapter 4, p. 4-3, paragraph 3 is revised to read:

The Navy will assume management responsibility for cultural resources within their withdrawal area. The Navy will acquire responsibility for compliance with the antiquities legislation and procedures described in Appendix G. If the Navy allows unrestricted vehicle access is not controlled within their lands, as has happened in the past, then significant negative impacts can be projected for cultural resources.

Chapter 4, p. 4-5, last paragraph and p. 4-6, first paragraph are revised to read:

In addition to ORV-related impacts, Naval activities would continue to occur in these areas. These include direct habitat-disturbing activities such as bombing, parachute dropping, use of heavy equipment, use of flares associated with nighttime bombing, localized strafing, use of remote-controlled moving targets travelling cross-country, and parachute recovery teams and other personnel moving cross-country. ~~The severity of these impacts would depend upon the level of military use.~~ As long as the current level and pattern of use continues, impacts are likely to continue at their present level except for some increase in surface disturbance due primarily to additional cross-country vehicle use. ~~However, if the number of targets, locations of targets, or types of uses change, areas negatively impacted would increase. In a worst-case situation, the withdrawn area's wildlife values could be virtually lost. Noise impacts related to low-flying aircraft could be similar to ORV-related noise impacts.~~

Chapter 4, p. 4-8, paragraph 3 is revised to read:

MUC I and MUC M to Unclassified and Unclassified Remaining Unclassified: The severity of vegetative impacts in this creosote bush scrub community would be dependent on the level of military use. As long as present levels of military use on these parcels continues, the vegetative community should remain unaffected. ~~However, if the number of targets increased or changed location, if new construction occurred or if additional roads were created, plants would be removed or crushed. Under heavy military activity, the possibility exists that much of the existing vegetation and all significant species would be destroyed.~~

Chapter 4, p. 4-11, Minerals section is revised as follows:

Alternative A would have a restricting effect on all mineral development on both the west and east sides of the study area. This effect would be due to limitations placed on land use by RSZs, rather than MUC designation. ~~Through the establishment of withdrawal (RSZ A), right-of-way (RSZ B) and cooperative agreement (RSZ C) areas,~~ mineral exploration and development would be reduced or eliminated altogether, depending on the area and the type of mineral subject to controls in withdrawal (RSZ A), right-of-way (RSZ B) and cooperative agreement (RSZ C) areas.

Oil and Gas: Oil and gas exploration and development would be limited primarily to RSZ B and C lands, due to concerns over surface occupancy ~~in the withdrawal and right-of-way areas.~~ Geophysical exploration activities might be allowed without major restrictions within the cooperative areas but usually not within RSZ A. In RSZ B, exploration activities might be allowed on a case-by-case basis ~~when the Navy was not utilizing the area and when such activities would not violate height or dust limitations.~~ with Navy concurrence.

Chapter 4, p. 4-12, delete paragraph 1.

Chapter 4, p. 4-12, paragraph 4 is revised to read:

Geothermal: Exploration and development of sites with geothermal potential, including the Truckhaven area and a portion of the East Brawley KGRA, would be ~~severely restricted because drilling operations would be limited due to height restrictions. The necessity to move drill sites because of height limitations could make it unfeasible for a lessee to explore and develop his lease.~~ subject to restrictions on drilling operations as described in the Cooperative Agreement (Appendix E). Drilling plans might require adjustment to reduce conflict with Navy flight operations.

Chapter 4, p. 4-13, paragraph 1 is revised to read:

Locatable Minerals: Exploration and development for locatable minerals in the entire study area could be severely restricted or eliminated in certain locations. Mineral entry would not be allowed in RSZ A. Operations would be ~~restricted in proposed RSZ B areas due to height and dust limitations. The same limitations might eliminate exploration in RSZ C if drilling rigs or explosives were required.~~ allowed on a case-by-case basis in proposed RSZ B and C areas due to height and dust concerns.

Chapter 4, p. 4-16. Paragraph 3 is revised to read:

In the event of Navy withdrawal of all lands within RSZ A, B, and C, most existing recreational uses would probably continue at least initially. However, the future of recreational opportunities on West Mesa would be strictly tied to the operational requirements of the Navy, ~~which might change in the future.~~ The future status of such projects as the Ocotillo Wells SVRA expansion would be dependent on compatibility with Navy operation and the willingness of the Navy to negotiate a cooperative agreement with the State for use of the lands.

Chapter 4, p. 4-16, the last paragraph is revised to read:

Oil and Gas: Under this alternative, the entire area would could be withdrawn for exclusive use by the Navy. All exploration activities such as geophysical and drilling operations would be allowed only under Navy approval. ~~The Navy could deny any proposed operation on either existing leases or new leases.~~

Chapter 4. p. 4-23, Amendment One - West Side. Add a new section:

Alternative E - Multiple Resources

Cultural Resources

This alternative, like Alternative D, provides administrative protection for cultural resource located within the proposed MUC L area. Vehicle access within such areas is limited to approved routes. Alternative E permits motorcycle race courses to cross MUC L lands on approved routes. Cultural resources located within the proposed MUC I area remain vulnerable to impacts from ORV free play. The closures identified in Alternatives A and D would be employed and would offer some protection at these sites.

The efficiency of this alternative in protecting archeological values is contingent upon BLM's enforcement and public compliance with travel regulations. If ORV use spreads, then resources may be damaged. Use of motorcycle race courses also requires monitoring to insure that route widening or course cutting does not occur.

Wildlife

This alternative calls for a reduction in the amount of Class I land from 27,780 to 13,290 acres and a corresponding increase in Class L acreage. The newly designated Class L lands are currently receiving both casual and competitive ORV use. Limiting this use to approved routes of travel and establishment of a designated race course system should be beneficial to the flat-tailed horned lizard. Approximately 4,860 acres of high density, 3,840 acres of medium density, 1,660 acres of low density, and 4,640 acres of potential optimal habitat for the lizard are within this area.

Endangered Species Act compliance would remain a BLM responsibility on all classified lands.

Vegetation

Impacts under this alternative would be the same as those described for Alternative A, except for those lands that are changing from MUC I to MUC L. Limiting open vehicular use to approximately 13,000 acres instead of 28,000 acres would be a reduction of about 30 percent in vegetation affected. All populations should benefit.

One area which would not benefit, as it would in Alternative D, would be the Mud Hills which contain populations of Thurber's pilostyles. This population would remain in MUC I.

Some site-specific impacts would be expected within MUC I. Avoidance of known stands or plants would be the principle mitigation for any use authorization. Casual use impacts would probably be intense but spotty throughout the MUC I area. Concentrations of sensitive vegetation could be protected in these areas by fencing, if necessary.

Wilderness

Impacts would be the same as those for Alternative A.

Recreation

Visitor Opportunities. Since Alternative E combines portions of Alternative A and D, its impacts reflects this mix. However, Alternative E also presents some new actions not found in any of the previous alternatives to enhance recreation opportunities.

This alternative would establish 15,090 acres of Open Area, intermediate between that provided by Alternative A and D. Although containing considerably less open acreage than Alternative A, Alternative E would include more of the most popular ORV play sites. The open Area would span both sides of the Superstition Mountains and would also include the sand dunes near the mountain's southeast end. Alternative A's open area would include only the south slope of Superstition Mountain. (The only other alternative to recognize the north slope and the sand dunes is Alternative C, Maximum Use).

In addition, Alternative E would recognize the important playriding opportunities in the mudhills, by including more of them in the Open Area than any other alternative -- roughly 320 more acres than Alternative A. Alternative E also recognizes the importance of "the Dip," a traditional camping area on Huff Road opposite the mudhills, about one mile south of the Imler Road junction. The Dip would remain completely within the Open Area boundaries, and would be re-established as a competitive event pit location. The area once served as a pit site, but was withdrawn from that use several years ago in order to reduce use of Imler Road near Target 101. By closing Imler Road north of "the Dip" and posting the boundary of RSZ A, public safety can be assured while leaving "the Dip", which is just outside of RSZ A, available for public use.

On the other hand, Alternative E would make the flats between Superstition Mountain and the gypsum railroad a Limited Area; this zone would be Open under Alternative A. This Limited Area designation is very similar to Alternative D, with one important difference -- popular campsites east of the Rockhouse in Sections 22 and 23 would remain within Alternative E's Open Area. With this important exception the impacts to recreation opportunities on the flats would be similar to those described for Alternative D.

Alternative E's remaining Limited Area, and its effects on recreation opportunities, remain identical to Alternative A. This Limited Area would be located on the west side of the gypsum railroad. Other aspects of Alternative E not specifically addressed here remain identical to Alternative A; these include designation of the San Felipe Corridor, two temporary closed areas, and impacts to activities other than ORV use.

Overall, the impact of Alternative E on ORV recreationists, both casual users and organized competitive events, would be a positive one. The alternative recognizes the most popular recreation sites by providing for their continued use to the maximum extent possible, while constraining playriding opportunities and sponsor-option racing on the relatively less important flats.

As with Alternative A, general public off-road access between the Superstition Mountain and Plaster City Open Areas would be restricted, due to the closure of the parachute drop zone RSZ A to public use. Two public access corridors would be approved, using existing routes along the edges of Target 103 RSZ A and the parachute drop zone, as shown on Map 32. However, the westernmost of these corridors is located on private land where it passes through Section 16, and as in to Alternative A, BLM would have to acquire Section 16 to assure the route's continued availability.

Conversion of the flats to Limited Area would have a bigger impact on competitive events than casual use, since up to 12 events per year use this area. However, this proposed Limited Area is largely devoid of special features that attract competitive use. Competitive event sponsors utilize this region chiefly to add mileage to course loops and to connect with more challenging terrain. A system of competitive event courses would be established within the Limited Area to allow this use to continue. As in Alternative A, use of RSZ A areas (such as the Parachute Drop Zone) for competitive events would continue, subject to Navy approval on a case-by-case basis, as is the current practice. Thus, competitive use of the area between the Superstition Mountain and Plaster City Open Areas would, for the most part, be unaffected.

Management Impacts: Alternative E would require intensive route inventory, signing, and boundary posting. Ranger patrol requirements would be similar to those for Alternative D. However, since more of the traditionally popular ORV playriding sites are included in Alternative E's Open Area, some of the enforcement problems created by having the Superstition Mountain Open Area surrounded by Limited Area would be reduced.

Under Alternative E, the workload for management of competitive events would be intermediate between that for Alternatives A and D. Detailed course compliance checks would be required on an estimated 12 additional events per year, compared to seven events for Alternative A and 17 for Alternative D.

Visual Resources

Impacts would be the same as those for Alternative A.

Minerals

Impacts would be the same as those for Alternative A.

Lands

Impacts would be the same as those for Alternative A

Chapter 4, p. 4-23, final paragraph is revised to read:

Military activity constitutes the greatest impact to those cultural resources present on East Mesa. Current ~~Potential~~ disturbances for withdrawal areas are similar to those described for West Mesa, although search traffic is less and there are no remote-controlled vehicles employed on the east side. ~~New targets and service facilities may be erected with extreme surface disturbance and potential loss of resources.~~

Modifications and Corrections

Chapter 4, p. 4-24. Revise paragraphs 2, 3, and 4 to read:

Archaeological values within portions of ACEC 66 may be damaged by military activities. Resources within the ACEC have been only partly inventoried and those sites are located around a marsh environment situated within the proposed withdrawal. Undetected sites could be impacted if Navy operations were increased.

The withdrawal of ACEC 66 for military purposes may be inconsistent with the Desert Plan. The goal of an ACEC designation is to identify, protect, and monitor significant cultural resources located on public land (USDI, BLM 1980). Current information is limited but indicates that only portions of the ACEC contain cultural resources (Alternative D). A conflict arises between implementation of the Navy withdrawal and maintenance of the ACEC designation. Resolution of this conflict involves two alternatives: 1) remove those portions of the ACEC currently located within the proposed withdrawal area from ACEC status, or 2) develop a cooperative agreement between the Navy and the BLM for continued management of the ACEC.

Chapter 4, p. 4-24, Final paragraph is revised to read:

If the level and kind of current Navy activities remain the same, no additional impacts would occur. ~~However, if these activities increased, impacts could become more widespread. In the worst case, wildlife values could be lost.~~ Although no sign of the flat-tailed lizard has been observed in approximately 1,500 acres of the area which has been surveyed, virtually all of the rest of the area has been identified as potential optimal habitat.

Chapter 4, p. 4-26, Paragraph 6 is revised to read:

Minerals

In general, impacts would be the same as described for Alternative A on the West Side study area. However, exploration of sites with geothermal potential, including a portion of the East Brawley KGRA, ~~could be severely restricted because drilling operations would be limited due to height restrictions. The necessity to move drill sites because of height limitations could make it unfeasible for a lessee to explore and develop his lease.~~ would be allowed on a case-by-case basis (See Appendix E , p. 18).

Chapter 4, p. 4-28. Paragraph 1 is revised to read:

Cultural Resources

The No Action alternative would permit current levels of public use to continue or increase. This would result in continued deterioration of those archaeological resources on East Mesa. ~~Potential impacts from military actions would remain the same. diminish,--since--the--current--size--of--the--withdrawal--would--be--maintained.~~ ACEC 66 would be retained by BLM, although management would not be as effective as for Alternative A because of the Class M designation (Appendix G).

Chapter 4, p. 4-28. Paragraph 3 is revised to read:

It is possible that this alternative would result in the Navy's reapplying for a withdrawal of the entire study area. The associated types of impacts are outlined in the discussion of Alternative A impacts for the West Side. ~~A total withdrawal could impact primarily medium and low density flat-tailed horned lizard habitat,--and--could--also--affect--habitat--for--the--Federal candidates Andrew's dune scarab beetle and desert tortoise. Important burro mule deer habitat and windmill water sources would also be lost.~~ Even with total withdrawal, no change in military operations is expected; any increase would require NEPA compliance.

Chapter 4, p. 4-28. Delete paragraph 6.

Chapter 4, p. 4-32, Amendment 1, East Side. Add the following section after the section on Lands for Alternative D:

Alternative E: Multiple Resources

Vegetation

The 160 acre parcel containing a small marsh could be safeguarded by cooperatively managing it with the Navy, even though the area would become withdrawn for Navy purposes.

Impacts for all resources would be the same as for Alternative A.

Chapter 4, p. 4-33, Amendment 4, Alternative B: Add the following:

Minerals

Every R&PP action would segregate mineral location and mineral material disposal since no regulations have been issued by the Secretary for administration of minerals once an R&PP action is approved.

Chapter 4, p. 4-37, Amendment 7, Alternative B: Substitute the following paragraph for the one under Minerals.

Acceptance of this alternative would subject the MUC L lands to stricter regulations under the MUC L designation.

Chapter 4, p. 4-40, Amendment 8: following paragraph 2, add the following:

Minerals

Mineral exploration and development could be delayed by stricter regulations under the MUC L designation.

Chapter 4, p. 4-41, Amendment 9: following paragraph 2, add the following:

Minerals

Mineral exploration and development could be delayed by stricter regulations under the MUC L designation.

Chapter 4, p. 4-51, Amendment 15: Change paragraph 5 (Minerals) as follows:

All of the unclassified lands are either under lease or are adjacent to lands which are under gas or oil leases. Acceptance of Alternative A would not curtail the development of the existing leases, and the remaining unleased lands would continue to be available for future leasing. The designation of lands as MUC L would impose significant restrictions on casual use operations under the Mineral Leasing and Mining Acts.

Chapter 4, p. 4-53, Amendment 16: In line 4 of the section on Wildlife and Vegetation for Alternative A, substitute the word "partially" for "substantially".

Chapter 4, p. 4-54, Amendment 16: After paragraph 1, add the following:

Minerals

Closure of part of the dunes would beneficially impact mineral operations, since conflicts between ORVs and mineral operations would be reduced. In contrast, closure would have a negative impact on casual use operations, because of lack of access.

Soils

Vehicle use on dunes would leave minor impacts on soils because dune sands are extremely resistant to soil compaction and have very small increases in wind erosions after disturbance. Studies done with a portable wind tunnel show that many disturbed dune surfaces have slightly lower wind erosion threshold velocities (wind velocity at which wind erosion begins) than undisturbed dune surfaces. On virtually all dune surfaces, crusts are very weak or nonexistent and produce very little or no stabilization. The wind erosion threshold velocities of both disturbed and undisturbed sand dunes are both so low that they would be exceeded by many winds. There would be small differences in sand moved on disturbed dunes compared to undisturbed dunes. Visual traces of tracks in dune sand would not remain long because of the frequent movement of sand. However, if use is allowed, new tracks would frequently be created so tracks would generally be visible.

Chapter 4, p. 4-54, Amendment 16. For Alternative B, add:

Soils

Same as Alternative A.

Chapter 4, p. 4-55, Amendment 16. For Alternative D, add:

Soils

Same as Alternative A

Chapter 4, p. 4-56, Amendment 17: Revise the section on livestock grazing for Alternative A to read:

Cattle would be excluded from the area south of I-40. This area is used as ephemeral range in the springtime. Although there would be no change in the perennial carrying capacity, in most years there would be less ephemeral forage available for temporary non-renewable use, due to the loss of that portion of the allotment south of I-40.

Chapter 4, p. 4-57, Amendment 17: Revise section on livestock grazing for Alternative C to read:

Rejection of the amendment would have no effect. Grazing would continue as it is at present.

Chapter 4, p. 4-57, Amendment 17: Revise the section on Wildlife for Alternative C to read:

Livestock grazing would continue south of I-40, and cattle would continue to range into bighorn sheep habitat in the Clipper Mountains. Potential impacts to bighorn, in the form of introduction and/or spread of disease, as well as competition for forage and water, would persist. Under the current situation, these impacts are ~~probably-occurring-to-at-least-a-small-degree~~ questionable, since there is no clear evidence that the livestock using the Clippers carry diseases. ~~If these factors are influencing bighorn sheep negatively,~~ If the diseases were introduced, the Clipper Mountains bighorn herd could experience decline through decreased carrying capacity, reduced lamb recruitment, die off, or possibly emigration. Ultimately, the bighorn herd could stabilize at a new and lower level. In the worst case, which seems unlikely, the population could be extirpated.

Chapter 4, p. 4-63, mitigation measures:

Revise the mitigation chart as follows. Revise mitigation No. 16 and add mitigation No. 17 for cultural resources:

Chapter 4, p. 4-64, Mitigation Measures: Add Mitigation No. 6 for recreation:

6) Acquire public access rights-of-way within Limited Areas where approved routes cross parcels of private property.

Chapter 4, p 4-60 to 4-64, Mitigation Measures: make the following revisions:

MITIGATION MEASURES

The following mitigation measures will be required by the BLM for impacts described in the preceding section.

AMENDMENT ONE
NAVY COOPERATIVE AGREEMENT - WEST SIDE

<u>Mitigation Measure</u>	<u>Alternatives</u>
<u>Cultural Resources</u>	
1) Erect appropriate signs around two temporary closures until data recovery is complete. Conduct weekly ranger patrols.	A, D, E
2) Erect fencing around northern temporary closure until data recovery is complete. Complete fencing prior to implementing amendment.	A, D, E
3) Perform site documentation and data recovery within both temporary closures.	A, D, E
4) Conduct data recovery at both creamation areas.	A, B, C, D, E
5) Conduct additional cultural resource distribution studies or sample inventories within Class I areas.	A, C, E
6) Conduct archaeological site assessment, documentation and excavation of sites located within Class I areas, but located outside the temporary closures.	A, C, D, E
7) Monitor site locations outside Class I areas and mitigate sites if studies show negative impacts from ORV traffic.	A, C, D, E
8) Erect route designation and closed route signs according to results of route approval process.	A, D, E
9) Develop BLM ranger patrol program to ensure route of travel designations are followed by the public.	A, C, D, E
10) Close all Navy withdrawal areas to indiscriminate vehicle use by the public and enforce closure.	A, B, C, D, E
11) Navy shall prohibit indiscriminate off-road vehicle travel by Navy personnel within withdrawal areas, unless a cultural inventory has been performed.	A, C, D, E

<u>Mitigation Measure</u>	<u>Alternatives</u>
12) Designate corridors through Navy withdrawal areas for public access and motorcycle race activity. Perform appropriate environmental studies prior to designation. Sign and enforce route designation.	A, D, E
13) Navy shall conduct a sample inventory over all Navy withdrawal areas and a Class III (100%) inventory over high sensitivity areas.	A, C, D, E
14) Navy shall perform mitigation or data recovery at several known sites within the Bullhead and Camelot Drop Zones and other sites identified through inventory required in item 13.	A, C, D, E
15) Navy shall follow requirements found within the National Historic Preservation Act of 1966 (36 CFR 800) for new target development or any other surface disturbing activity.	A, B, C, D, E
16) The Navy, BUREC, and BLM shall agree on each agency's responsibility for Section 106 compliance within the entire project area. The three agencies shall formulate an agreement for concurrence by the State Historic Preservation Officer and, or the Advisory Council on Historic Preservation.	A, C, D, E
17) U. S. Navy will adhere to NEPA and other national resource mandates for any additional or new projects or activities that are proposed above the current level of use.	A, C, D, E

Wildlife

- | | |
|--|---------------|
| 1) Conduct additional flat-tailed horned lizard inventory. If species is present, apply mitigation measures. | A, B, C, D, E |
| 2) Monitor flat-tailed horned lizard populations in MUC I areas. | A, C, D, E |
| 3) Monitor flat-tailed horned lizard populations in Unclassified areas, with Navy OK as appropriate. | A, B, C, D, E |

<u>Mitigation Measure</u>	<u>Alternatives</u>
4) Prohibit surface-impacting Naval activities in high density flat-tailed horned lizard optimal habitat. Make this stipulation on any withdrawal applications.	A, B, C, D, E
5) If the nature or location of current Navy activities change in the habitat of the flat-tailed horned lizard, perform specific environmental assessment(s) with Endangered Species Act, Section 7 consultation.	A, B, C, D, E
6) Prohibit establishment of new race corridors outside of MUC I.	A, B, C, E
7) Limit casual use and competitive events in the Parachute Drop Zone to two designated corridors.	A, B, C, E
8) Fence high density optimal flat-tailed horned lizard habitat to exclude surface disturbances	A, B, C
9) Establish ranger patrol.	A, B, C, D, E

Vegetation

1) Inspect all existing competitive event courses for plant species of special significance and prohibit the establishment of new courses outside of MUC I.	A, B, C, D, E
2) Designate two corridors through the Parachute Drop Zone that may be used for competitive events. Prohibit all ORV use on unclassified land outside of these corridors.	A, B
3) Fence off stands of more than 25 plants of Thurber's pilostyles in MUC I areas.	A, C, E
4) Designate an unusual plant assemblage of Thurber's pilostyles covering Sections 31 and 32, T 14S, R. 12E, and Sections 26, 27, and 28 T 13S, R. 11E. This is the largest known population of this species on public land in California.	A, C, D
5) Conduct a thorough in-season plant inventory in all newly-designated MUC I areas.	A, C, E

Recreation

1) In the event of full Navy withdrawal of RSZ A, B, and C, develop a cooperative agreement	B
---	---

<u>Mitigation Measure</u>	<u>Alternatives</u>
to provide for continued BLM recreation management of RSZ B and C.	
2) Designate two public access corridors through the unclassified lands of the Parachute Drop Zone, RSZ A, to provide a direct connection between the Superstition Mountain and Plaster City Open Areas, or acquire a public access right-of-way through Section 16, T 15S., R 11E.	A, D, E
3) Acquire all private property within the Class I (Open Area) designation.	A, B, C, D, E
4) Establish a bulldozed trail along the boundaries of all Class I Open Areas to make them more visible and manageable.	A, C, D, E
5) Fence the temporary closures to lessen the amount of patrol time required to protect them.	A, D, E
6) Acquire public access rights-of-way within Limited Areas where approved routes cross parcels of private property.	A, B, C, D, E

AMENDMENT ONE

NAVY COOPERATIVE AGREEMENT - EAST SIDE

Cultural Resources

- | | |
|---|---------------|
| 1) Prohibit any surface disturbance within Section 19 NE, T 14S, R 19E. | A, B, C, E |
| 2) Perform cultural resource inventories within the portion of ACEC 66 which would be placed under Navy withdrawal. | A, C, D, E |
| 3) Navy shall follow requirements of the National Historic Preservation Act of 1966 (36 CFR 800) for new target development or any other surface disturbing activity. | A, B, C, D, E |

Wildlife

- | | |
|--|------------|
| Prohibit any surface disturbance in Sec. 19 NE T 14S, R 19E. | A, B, C, E |
|--|------------|

Vegetation

- | | |
|---|------------|
| 1) Prohibit all surface disturbance in NE Sec. 19, T 14S, R 19E, to prevent the | A, B, C, E |
|---|------------|

Mitigation Measure

Alternatives

destruction of a valuable riparian community.

Recreation

- 1) In the event of full Navy withdrawal of RSZ A, B, and C, develop a cooperative agreement to provide for continued BLM recreation management of RSZ B and C. B
- 2) Fence the boundary of RSZ A near areas of recreational use concentration. C

Lands

Relocate or reconfigure the Navy's proposed withdrawals (unclassified areas) to preserve Energy Production and Utility Corridor M at its present width. Rationale - This would provide for future geothermal energy production and electrical transmission system reliability, while preserving the only north-south corridor from the Imperial Valley to the Coachella Valley, which was defined in 1980. A, C, D, E

Appendix B, p. B-2, Amendment 4:

Add to the new guideline for waste disposal in Classes M and I:
"In land sales or exchanges, NEPA requirements will be met".

Appendix D, p. D-3, Vegetation Element goals:

Renumber Goal 5 to Goal 6, and add a new Goal 5 (same as Goal 3 in the original goals). The new Goal 5 reads:

- (5) To manage wetland and riparian areas in the Desert. Specific objective will be:
 - (a) To avoid the long-term and short-term impacts associated with the destruction, loss, or degradation of wetland and riparian areas;
 - (b) To preserve and enhance the natural and beneficial values of wetland and riparian areas which may include constraining or excluding those uses that cause significant long-term ecological damage;
 - (c) To include practical measures to minimize harm in all actions causing adverse impacts on wetland and riparian areas; and
 - (d) To retain all wetlands and riparian habitats presently under BLM administration where high resource values exist and adverse impacts cannot be mitigated.

Appendix D, p. D-4, Recreation Element goals, correct Goal 2 to read:

Provide a minimum of recreation facilities; emphasize with emphasis on resource protection and safety.

Appendix D, p. D-4, Recreation Element goals: in Goal 3, remove the word "important" from the second line.

Appendix D, p. D-4, Recreation Element goals: in Goal 4, change "sensitive of" to "sensitivity to."

Appendix D, p. D-4, Geology, Energy, and Mineral Resources Element: Revise the goals as follows:

1. Within the multiple-use management framework, assure the availability of known mineral resources land for exploration and development.
2. ~~Foster and encourage orderly and economic~~ the development of mineral resources in a manner that satisfies national and local needs and provides for economically and environmentally sound exploration, extraction and reclamation processes.
- ~~-3. Assure mineral resource input to planning, recognizing concurrent or sequential use.~~
3. Develop a mineral resource inventory, GEM database, and professional, technical and managerial staff knowledgeable in mineral exploration and development.
4. Manage mineral lease and material sale operations to insure conservation of mineral resources, verification of production, diligent development, compliance with approved plans, and receipt of fair market value.

Appendix E - Cooperative Agreement Between the Navy, the Bureau of Land Management, and the Bureau of Reclamation.

A few changes have been made in the original agreement, mostly concerning the role of BUREC and safety requirements for new utility corridors within the cooperative agreement area. The following portions of the revised cooperative agreement should be compared to the original:

- IV-C Current Operational Requirements, BUREC, p. 5;
- IV-D Existing Memorandum of Agreements (MOAs), Public Land Order (PLO) and Guidelines, p. 5., a, d, and e;
- VI-D2 Operations, Lands and Realty Program Management, Rights-of-ways and Cooperative Agreement, p. 16, 17.

Appendix I, p. I-1, change last paragraph to read:

Huff, Wheeler, and Imler County roads provide convenient access from the south and east.

Appendix I, p. I-2, Revise Figure I-1 as shown:

FIGURE I-1

Evaluation of Characteristics of
Superstition Mountain Open Area

<u>Resource Values</u>	<u>Sensitivity</u>		<u>Site Values</u>	<u>Suitable</u>	
	Yes	No		Yes	No
Soil, Slope	—	<u>X</u>	Terrain diversity	<u>x</u>	—
Plants & Wildlife	<u>X</u>	—	Accessibility	<u>X</u>	—
Cultural Resources	<u>X</u>	—	Traditional Use	<u>X</u>	—
Native American	<u>X</u>	—	Proximity to Users	<u>X</u>	—
Wilderness	—	<u>X</u>	Size	<u>X</u>	—
Scenic Quality	—	<u>X</u>	Manageable Boundaries	<u>X</u>	—
Recreation	—	<u>X</u>			
Range	—	<u>X</u>			
GEM	—	<u>X</u>			

<u>Other Site Values</u>	<u>Sensitive</u>	
	Yes	No
Res., Pvt. Owner	<u>X</u>	—
Agriculture	—	<u>X</u>
Educ., Research	—	<u>X</u>
Other Agencies	<u>x</u>	—
Safety	<u>x</u>	—
Adjacent Land Use	—	<u>X</u>

Appendix I. p. I-3, change paragraph 4 to read:

MANAGEABLE BOUNDARIES

The area's major shortcoming is the general lack of clearly identifiable boundaries between the open area and adjacent limited or withdrawn areas. Under all management alternatives considered, extensive use of signs would have to be made in order to adequately identify these boundaries to the public. In most cases, boundaries would be located on flat open ground without using identifiable features such as roads or powerlines. Some boundaries pass through badland "mudhill" terrain. In many areas boundaries make frequent right-angle turns along the edges of legal subdivisions. At least 330 "open," "closed" and "limited" boundary signs would be required to implement Alternative E, the preferred alternative.

Appendix I, p. I-3. Change the first sentence of paragraph 5 to read:

The open area would contain 5,000 acres of private lands under Alternative A, 7,220 acres under Alternative C, 1,200 acres under Alternative D, and approximately 1,360 acres under Alternative E.

Appendix I, p. I-3, change the last paragraph to read:

The Bureau of Reclamation and U.S. Navy are signator parties. Until such time as Reclamation relinquishes its withdrawal, it must concur in all BLM will be responsible for management actions in the area. Navy operational requirements are deliniated in the proposed BLM, Navy Cooperative Agreement.

Appendix I, p. I-4. Following the first paragraph, insert the following section

SUMMARY OF PUBLIC COMMENTS

Environmental groups were concerned that archeological sites and flat-tailed horned lizard habitat were being included within the Open Area in Alternative A; they favored Alternative D. Off-road Vehicle groups wanted the open area to be as large as possible, encompassing all the traditionally popular ORV free play and camping areas; they favored Alternative C. Off-road groups also questioned the advisability of rerouting Imler road around the south side of Superstition Mountain, siting potential maintenance problems due to flash flooding.

Appendix I, p. I-4. Revise the Proposed Decision to read:

PROPOSED DECISION

The open area in Alternative E (Multiple Resources) will be designated for motorized vehicle free play (Maps 33, 35). Appropriate mitigation measures will protect sensitive resources as described in Chapter IV.

Appendix I, p. I-4. Revise the Rationale to read:

RATIONALE

In making the decision to establish a portion of the area for motorized vehicle free play, consideration has been given to the high-quality opportunities for off-road recreation which have made the Superstition Mountain area the second most popular vehicular recreation area in Western Imperial County. Consideration was also given to sensitive resources and other sensitive factors such as private lands, Navy operations, and safety.

The Bureau feels that Alternative E would represent the best possible compromise between these conflicting uses and values. The size of the open area would be significantly reduced, resulting in less than one-third as much private land being included within its boundaries. Much optimal flat-tailed horned lizard habitat and most important cultural resource sites would be excluded from the open area. Yet the open area boundaries would be strategically located to maximize the area's recreation opportunities, by recognizing existing recreation use patterns to the maximum extent possible. BLM would continue to work closely with the Navy in planning for signing and other aspects of visitor use supervision, to assure public safety and protection of sensitive military installations.

APPENDICES

AMENDMENT 9

CIVIL HABITAT

100% CIVIL HABITAT

100% CIVIL HABITAT

AMENDMENT 8

Sec. 10, T4S/R6E

100% CIVIL HABITAT

100% CIVIL HABITAT

APPENDIX A

MAPS (EXCEPT AMENDMENT ONE)

AMENDMENT 8

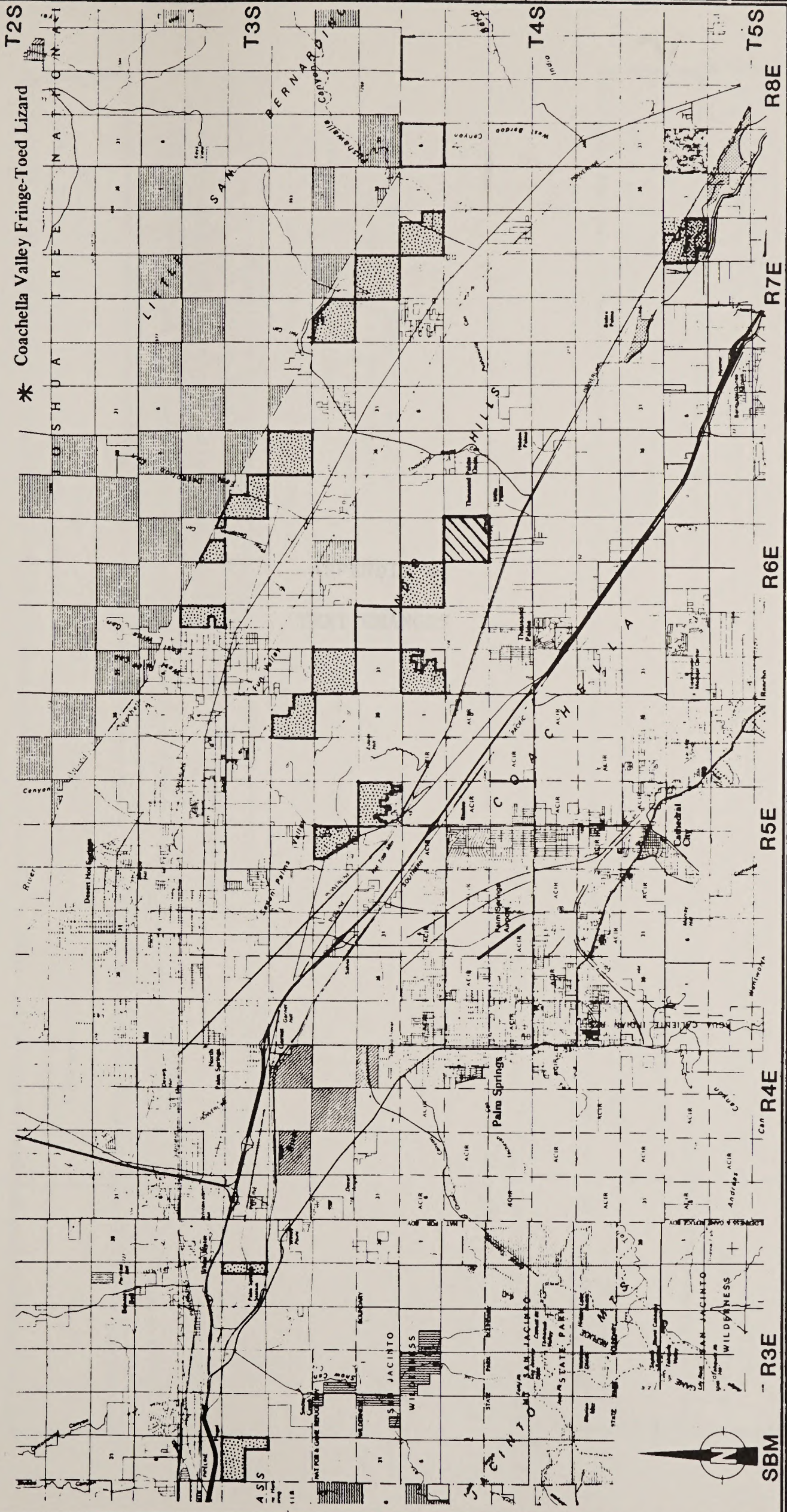
Sec. 10, T4S/R6E

Change from 'U' to 'L'

AMENDMENT 9

CVFTL HABITAT *

CHANGE FROM 'U' TO 'L'



APPENDIX B
 CHANGE THE MULTIPLE USE CLASH EVALUATION TO PROVIDE BASTER RESIDUAL SIZE (OTHER EVALUATION IS
 NOW MADE UP OF THE CLASHES IN PART 1.

	MULTIPLE USE CLASHES (Other than Confidential Management)	MULTIPLE USE CLASHES (Confidential Management)	MULTIPLE USE CLASHES (Confidential Management)	MULTIPLE USE CLASHES (Confidential Management)
<p> MULTIPLE USE CLASHES (Other than Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>

APPENDIX B TEXT CHANGES

APPENDIX B

CHANGE THE MULTIPLE USE CLASH EVALUATION TO PROVIDE BASTER RESIDUAL SIZE (OTHER EVALUATION IS
 NOW MADE UP OF THE CLASHES IN PART 1.

	MULTIPLE USE CLASHES (Other than Confidential Management)	MULTIPLE USE CLASHES (Confidential Management)	MULTIPLE USE CLASHES (Confidential Management)	MULTIPLE USE CLASHES (Confidential Management)
<p> MULTIPLE USE CLASHES (Other than Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>	<p> MULTIPLE USE CLASHES (Confidential Management) </p>

AMENDMENT FOUR:
CHANGE THE MULTIPLE USE CLASS GUIDELINES TO PROHIBIT WASTE DISPOSAL SITES (EITHER HAZARDOUS OR NON HAZARDOUS) IN CLASSES M AND I.

	MULTIPLE-USE CLASS C Controlled Use (Wilderness Management)	MULTIPLE-USE CLASS L Limited Use	MULTIPLE-USE CLASS M Moderate Use	MULTIPLE-USE CLASS I Intensive Use
16. WASTE DISPOSAL	Waste disposal sites will not be allowed in this class.	<p>Hazardous waste disposal sites will not be allowed.</p> <p>New non-hazardous waste disposal sites will not be allowed.</p>	<div>Public lands managed by BLM may not be used for hazardous waste disposal where locations suitable for such disposal are found on BLM-managed lands. Consideration will be given to transfer of such sites to other ownership for this use.</div> <div>Non-hazardous waste disposal sites may be allowed.</div>	

New Wording:

"Public lands managed by BLM may not be used for waste disposal (either hazardous or non-hazardous). Where locations suitable for disposal are found on BLM-managed lands, consideration will be given to transfer of such sites through sale or exchange to other ownership for this use. In land sales or exchanges, NFPA requirements will be met."

AMENDMENT FIVE:
CHANGE MULTIPLE USE GUIDELINES FOR TRANSMISSION FACILITIES TO BETTER IDENTIFY "TRANS DESERT TELECOMMUNICATIONS FACILITIES" AS COAXIAL AND FIBER OPTIC CABLES

	MULTIPLE-USE CLASS C Controlled Use (Wilderness Management)	MULTIPLE-USE CLASS L Limited Use	MULTIPLE-USE CLASS M Moderate Use	MULTIPLE-USE CLASS I Intensive Use
7. TRANSMISSION FACILITIES	New transmission facilities for electricity, gas, water, and telecommunications are not allowed and new licenses or rights-of-way for these purposes will not be granted, except as provided for in the Wilderness Act of 1964 — 16 USC 1133(d)(4), or as may be specified by Congress.	<div>New gas, electric, and water transmission and trans-desert telecommunications facilities may be allowed only within designated corridors (see Energy Production and Utility Corridors Element). NEPA requirements will be met.</div> <div>New wording: "New gas, electric, and water transmission facilities and cables (coaxial or fiber optic) for interstate communications may be allowed only within designated corridors (see Energy Production and Utility Corridors Element). NEPA requirements will be met."</div>		

COOPERATIVE AGREEMENT

- I. PURPOSE
- II. AUTHORITY
- III. DEFINITIONS
- IV. CURRENT OPERATIONS/ REQUIREMENTS

APPENDIX E

- A. NAVY
 - 1. R5A "A"
 - 2. R5B "B"
 - 3. R5C "C"
- B. BLM
- C. BLM
- D. Existing R5A, B, and C

COOPERATIVE AGREEMENT

BETWEEN

DEPARTMENT OF THE NAVY

AND

BUREAU OF RECLAMATION

AND

BUREAU OF LAND MANAGEMENT

- VI. OPERATIONS
 - A. General Resource Management
 - B. General Resource Management
 - C. Rights-of-way and Cooperative Agreements
 - D. Lands and Realty Program Management
 - 1. Minerals
 - 2. Rights-of-way and Cooperative Agreements
 - 3. Disposal of land
 - 4. Acquisition of lands or easements
 - E. Minerals Management
 - 1. Locatable Minerals
 - 2. Oil and Gas Pre-lease, Leasing and Post Lease Operations (R5A "A")
 - 3. Oil and Gas Leasing and Post Lease Operations (R5B "B" and "C")
 - 4. Oil and Gas Geophysical Operations - Vibrocoils, etc.
 - 5. Geothermal Pre-lease, Leasing, and Post Lease Stage
 - 6. Geothermal Geophysical Operations
 - 7. Salable Minerals
- VII. PUBLIC SAFETY
 - A. Range Safety Issues
 - 1. R5A "A"
 - 2. R5B "B"
 - 3. R5C "C"
 - 4. Air Space

August 15, 1986

COOPERATIVE AGREEMENT

- I. PURPOSE
- II. AUTHORITY
- III. DEFINITIONS
- IV. CURRENT OPERATIONAL REQUIREMENTS
 - A. NAVY
 - 1. RSZ "A"
 - 2. RSZ "B"
 - 3. RSZ "C"
 - B. BLM
 - C. BUREC
 - D. Existing MOAs, PLO, and Guidelines
- V. AGREEMENT OBJECTIVES
 - A. RSZ "A"
 - B. RSZ "B"
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- VI. OPERATIONS
 - A. General Resource Management
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 - D. Lands and Realty Program Management
 - 1. Withdrawals
 - 2. Rights-of-Ways and Cooperative Agreement
 - 3. Disposal of Land
 - 4. Acquisition of Lands or Easements
 - E. Minerals Management
 - 1. Locatable Minerals
 - 2. Oil and Gas Pre-Lease, Leasing and Post Lease Operations (RSZ "A")
 - 3. Oil and Gas Leasing and Post Lease Operations (RSZ "B" and "C")
 - 4. Oil and Gas Geophysical Operations - Vibrosis, etc.
 - 5. Geothermal Pre-Lease, Leasing, and Post Lease Stage
 - 6. Geothermal Geophysical Operations
 - 7. Saleable Minerals
- VII. PUBLIC SAFETY
 - A. Range Safety Zones
 - 1. RSZ "A"
 - 2. RSZ "B"
 - 3. RSZ "C"
 - 4. Air Space

VIII. FACILITY PROTECTION

A. Range Safety Zones

1. RSZ "A"
2. RSZ "B" and "C"

IX. COOPERATIVE AGREEMENT IMPLEMENTATION

X. NAVY-BLM INTERIM MANAGEMENT

XI. APPROVAL

I. PURPOSE

This Cooperative Agreement assigns responsibility and coordination of federal land uses in Imperial County, California that are presently being managed by the Bureau of Land Management (BLM) and Bureau of Reclamation (BUREC). Existing Department of the Navy (NAVY) uses are recognized and provided for by Range Safety Zones (RSZ) and subsequent stipulations and reservations in the RSZ. This Cooperative Agreement between BLM, NAVY and BUREC will have a term of twenty (20) years from the date of execution of this agreement.

II. AUTHORITY

A. Bureau of Land Management

1. The Federal Land Policy and Management Act of 1976 (FLPMA), P.L. 94-579, 90 Stat. 2766, 43 U.S.C. 1737.

B. Bureau of Reclamation

1. The Reclamation Act of 1902, 32 Stat. 388, 43 U.S.C. Chapter 12, as amended and supplemented.

C. Department of the Navy

1. 10 U.S.C. 2233
2. The Engle Act of 28 February 1958, U.S.C. 155-158

III. DEFINITIONS

- A. District Manager: means the Bureau of Land Management's District Manager, California Desert District, Riverside, California.
- B. Area Manager: means the Bureau of Land Management's Area Manager, El Centro Resource Area, El Centro, California.
- C. Regional Director: means the Bureau of Reclamation's Regional Director, Lower Colorado Regional Office, Bureau of Reclamation, Boulder City, Nevada.
- D. Commanding Officer: means the Commanding Officer of the Naval Air Facility, El Centro, California.

- E. Withdrawal: means withholding an area of federal land from settlement, sales, location, or entry under some or all of the general land laws for the purpose of limiting activities under those laws or transferring jurisdiction over an area of federal land to another government agency. (See 43 CFR 2300).
- F. Right-of-Way: means the public lands authorized to be used or occupied pursuant to Title V of FLPMA (specifically Sec. 507) authorizing and granting use of federal lands to any department or agency of the United States for specified purposes. (see 43 CFR 2807).
- G. RSZ: means Range Safety Zones which prioritize relative hazard risks and safety requirements with respect to noise, drop hazard, and aircraft accident potential.
- H. Aerial Weapon Training Ranges, (R-2510 and R-2512): means designated military airspace within which the flight of aircraft while not wholly prohibited, is subject to restrictions.
- I. Concurrence: means review and approval by Commanding Officer prior to granting a variance on normally incompatible land use requests to determine public safety.
- J. Desert Plan: means the comprehensive plan prepared for the California Desert Conservation Area, required by FLPMA, action 601(d) (43 U.S.C. 1781).

IV. CURRENT OPERATIONAL REQUIREMENTS

A. NAVY

- 1. RSZ "A" - Required surface impact target areas, which are areas of extreme hazard and subject to possible impact from dropped ordnance. Operations conducted in these areas pose a great potential threat to ground surface activities, and are highly susceptible to aircraft crash.

2. RSZ "B" - Designated areas subject to significant overflight conditions where jet aircraft are operating in an armed mode. Arming refers to the in-flight procedure of disengaging the aircraft safety latch mechanism in preparation for ordnance release at the target. While ordnance concussion does not normally occur in this area, an occasional inadvertent drop is possible due to an electrical short, air turbulence or other unexpected occurrence.

Within the "B" area aircraft are flying at low levels and traveling at speeds in excess of 500 knots, which severely limits the range of possible ground surface activities.

In areas close to the target, a noise hazard also exists with possible peak sound pressure levels of over 100 db (A). It can be expected that the Community Noise Equivalent Level (CNEL) for the areas could be in excess of 80 db. Special speech communication systems may be necessary as well as the use of protective means to reduce the risks of hearing damage.

The "B" area is the area over which pre- and post-drop maneuvers must be conducted, i.e., dives, pop-ups, etc. Special attention must be given toward eliminating ground activities which could be of a distracting or disorienting nature.

This area is also an area with a greater chance of aircraft mishaps or accidents due to the aircraft weapons systems being armed.

3. RSZ "C" - The area is intended to provide an adequate area of protected space in which military training exercises can be safely conducted without interference from general aviation traffic. There are also height and population density concerns which will need to be controlled. Considering the altitude of the aircraft and the type of maneuver the aircraft is likely to be engaged in, less danger exists to surface activities in this area although certain activities must be restricted.

B. BLM

Congress enacted the Federal Land Policy and Management Act of 1976 (FLPMA) which directed the BLM to complete a comprehensive land use plan. Completed in 1980 as the California Desert Conservation Area (CDCA) plan, it has resolved many conflicting uses of public land resources and established a framework of multiple use and sustained yield of all resources as defined in Section 103 of FLPMA.

Other laws providing management authority for these public lands according to multiple use and sustained yield include the following:

1. U.S. Mining Laws
2. Taylor Grazing Act of 1934
3. Wilderness Act of 1964
4. Historic Preservation Act of 1966
5. U.S. Mineral Leasing Laws
6. Mining and Minerals Policy Act of 1978
7. Wild and Free-Roaming Horse and Burro Act of 1971
8. Endangered Species Act of 1973
9. Sikes Act of 1974
10. Public Range and Improvement Act of 1978
11. National Environmental policy Act (NEPA) of 1969
12. Antiquities Act of 1906
13. Clean Air Act as amended
14. Resource Conservation and Recovery Act of 1976
15. E. O. 11514 Environmental Quality
16. E. O. 11593 Protection of Cultural Resources
17. E. O. 11752 Environmental Quality at Federal Facilities
18. E. O. 11988 Floodplain Management
19. E. O. 11644 and 11989 Off-Road Vehicle Management, issued 1972 and 1977, respectively

C. BUREC

Much of the land covered by this agreement has been withdrawn for the All-American Canal System as provided for in the Boulder Canyon Project Act of December 21, 1928 (45 Stat. 1057). Certain areas have been identified by BUREC for continuation of the existing withdrawal orders to effectively protect and manage the Federal irrigation facilities.

D. Existing Memorandum of Agreements (MOAs), Public Land Order (PLO) and Guidelines

Existing MOAs and PLO currently relevant to these lands include:

1. Bureau of Reclamation/Navy, Contract No. 14-06-300-2098 (Navy NF(R)-7356), dated March 26, 1967.
2. Bureau of Reclamation/Navy, Contract No. 14-06-300-194 (Navy Noy(R)-48356, dated March 6, 1954.
3. Bureau of Reclamation/Navy Contract No. 14-06-300-1848 (Navy Noy (R)-99596), dated June 20, 1966.
4. Bureau of Reclamation/Navy Contract No. 2-07-30-L0168 (Navy N6247483RPOOA48), dated June 8, 1983.
5. Bureau of Land Management/Navy 1973.
6. Bureau of Land Management/Navy (PLO No. 4880), 1978.

General land use guidelines exist that underlie the operation of the CDCA plan. These include:

1. Valid Existing Rights - all actions taken will be subject to valid existing rights.
2. Impact Assessment - actions may require preparation of an environmental impact assessment.
3. Uses, Permits and Authorization - laws and regulations governing authorizations are included in Titles 30, 36, and 43 of Code of Federal Regulations or determined by BLM policy guidance.

4. Health, Safety, and General Welfare - temporary and emergency related uses of the public lands for protecting the health, safety and general welfare are expected. These include:

- a. repairs and maintenance of public utility and communication facilities, public roads, and highways
- b. search and rescue operations
- c. fire prevention and/or suppression
- d. law enforcement activities
- e. other activities of an urgent temporary nature

While this agreement among the three (3) agencies presumes each has a role, its general purpose is to put in place a basic agreement between BLM and NAVY to take effect immediately. BUREC's withdrawal remains in effect until revoked, relinquished or reaffirmed. The purpose of this agreement is to provide a land use system for public lands under joint administration. BLM acts as the lead surface manager and will keep all parties informed as to actions which may have an impact on current or potential uses. BUREC shall notify, in advance BLM of any activity of theirs which may have an impact on Navy's use of A, B, or C lands which may be withdrawn by BUREC. BLM shall notify Navy of such activity. If there are disagreements, all parties agree to meet and work to a resolution. Should BUREC's withdrawal not be revoked or relinquished, the locatable mineral portion of this agreement cannot be implemented.

V. AGREEMENT OBJECTIVES

- A. RSZ "A" - NAVY will make application to withdraw these target areas so as to have exclusive control, including the land use and height restrictions listed below in R-2510 and R-2512. The target boundaries and height restrictions are shown on the attached maps marked Exhibits "A" through "C".

R-2510 (West Mesa)

- a. All land uses will be prohibited. Scheduled event for off-road vehicle or other use as described in Article VI(B) 4 may be conducted on a not to interfere basis. These events are to be coordinated with, and approved by, the Commanding Officer.
- b. Height restriction is 0 (zero) feet as shown on Exhibit "C".

Containing 37,465 acres, more or less.

R-2512 (East Mesa)

- a. All land uses will be prohibited unless approved by the CONAF.
- b. Height restriction is 0 (zero) feet as shown on Exhibit "C".

Containing 15,969.25 acres, more or less.

- B. RSZ "B" - Navy will apply for a Right-of-Way in these areas with overall management responsibilities retained by BLM while recognizing all incompatible uses required by the Navy. These incompatible uses and height restrictions are listed below in R-2510 and R-2512. Boundaries and height restrictions are shown on the attached maps marked Exhibits "A" through "C".

R-2510 (West Mesa)

- a. Prohibited land uses include:

- (1) Heavy agriculture (e.g., feed lots, dairies).
- (2) Residential (e.g., single family, 1 unit/40 acres).
- (3) Public and Quasi-Public Facilities (e.g., schools and churches).
- (4) Commercial-retail, wholesale, professional.
- (5) Utility corridors, overhead power or gas lines except as specifically authorized elsewhere in this agreement.

Items 1 through 4 above are activities which do not occur on public lands. As described in Article VI (D) 2, existing utility lines are acceptable and new utility lines within planned corridors are acceptable on a case-by-case basis, subject to mitigation, and BLM designated corridors N (a designated utility corridor for future power and/or pipeline development) and Z (a 92 kV powerline for transmitting energy from geothermal and possible solar generators) are hereby recognized.

b. Possible incompatible land uses as follows may be granted permission subject to the concurrence of the Commanding Officer on a case-by-case basis:

- (1) Energy resources extraction/development.
- (2) Mining.
- (3) Outdoor recreation for off road vehicle use except as specifically authorized elsewhere in this agreement.
- (4) New proposed roads, structures, etc.
- (5) Light agriculture (e.g., crop farming).

Items 1 through 4 above are normally provided for on public lands. Such uses may still be allowed, subject to appropriate mitigation and as noted elsewhere in this agreement. Item 5 is not consistent with public land utilization.

c. Height restriction is (20 feet) as shown on Exhibit "C".

Containing 64,652 acres, more or less.

R-2512 (East Mesa)

a. The same land uses and height restrictions listed above under R-2510 (West Mesa) apply here.

As described in Article VI (D) 2, existing utility lines are acceptable and new utility lines within planned corridors are acceptable on a case-by-case basis, subject to mitigation, and BLM designated corridors M (a designated utility corridor for future power and/or pipeline development), T (a 12 inch pipeline as an alternative to Z and improved with existing electric transmission facilities) and

CC (1/500 kV power line requested by San Diego Gas and Electric Company as a possible alternative for their Arizona Interconnection Project from Yuma to the San Diego Area) are hereby recognized.

- b. The area in the RSZ "C" zone lying north of Highway 78 between Target 95 RSZ "A" and Target 68 RSZ "B" between the East Highline and Coachella Canals will have same land use restrictions as in the RSZ "B" with the exception that the 20 feet height restriction will be increased to 30 to 40 feet as shown on Exhibit "C".

Containing 10,454.21 acres, more or less.

- C. RSZ "C" - This area will be managed by BLM and BUREC under this Cooperative Agreement. Possession and management will be retained by BLM while recognizing potential conflicting uses required by the NAVY. These potential conflicting land uses and Navy's required height restrictions are listed below in R-2510 and R-2512. Boundaries and height restrictions are shown on the attached maps marked Exhibits "A" through "C".

R-2510 (West Mesa)

- a. Prohibited land use:

- (1) Public and Quasi-Public Facilities (e.g., schools and churches). These uses are not made on public lands.

- b. Potentially conflicting land uses, as follows, may be granted permission subject to the concurrence of the Commanding Officer on a case-by-case basis:

- (1) Heavy agriculture (e.g., feed lots dairies).
- (2) Commercial-retail, wholesale, professional.

- (3) Utility corridors, overhead power or gas lines except as specifically authorized elsewhere in this agreement.

Items 1 and 2 are not generally done on public lands.

- c. Height restriction is from 30 to 200 feet as shown on Exhibit "C".

R-2512 (East Mesa)

- a. The same land use and height restrictions listed above under R-2510 (West Mesa) apply here.

VI. Operations

A. General Resource Management

Laws and policies defined herein will be applied for management within RSZ "A", "B", and "C" for uses that include but are not limited to wildlife habitat, cultural resources, historic values, vegetative resources, environmental quality and wilderness resources. These factors will be considered on actions associated with public land uses which may be under consideration. Specific allowable land uses within these areas covered by this Agreement, such as recreation, minerals, and utility corridors are covered in detailed sections below. (Paragraphs B, D and E.)

Where BLM, and NAVY agree on the response to a land use request in RSZ "B" and "C" areas, but the applicant disagrees, BLM will issue a decision reflecting the position of the United States. The applicant shall have the appropriate appeal process available under the Administrative Procedures Act which is the normal procedure for such applications under public land laws and regulations.

If the Commanding Officer, Regional Director, or/and the Area Manager do not agree on the response to an application for land use in RSZ "B" and "C" areas, a resolution will be made by higher authority of both agencies. Authorization will be withheld by BLM pending an agreement between the agencies.

In those cases where an appeal is filed BLM agrees to keep BUREC and NAVY informed so that appropriate representation may be made.

BLM, BUREC, and NAVY recognize the need for public information and awareness regarding safety zones, permissible activities, and proper access. BLM will provide Ranger patrol and policing throughout the two zones (RSZ/B&C).

B. Recreation Management (RSZ "B" and "C")

1. BLM retains overall recreation management responsibility within RSZ "B" and "C" areas. BLM will enforce above land use restrictions and closely coordinate with the BUREC and NAVY in the development of recreation management plans and proposals for the area, and will obtain BUREC and NAVY concurrence in RSZ "A" and "B" areas before approving such plans or proposals.
2. Public access via Imler and Huff Roads will be eliminated through Target 101 of RSZ "A" in R-2510. NAVY will coordinate with BLM and the County of Imperial to provide alternate access.
3. Public access to the "Rockhouse" area on the south side of Superstition Mountain which passes through RSZ "A" in R-2510 will be eliminated. NAVY will coordinate with BLM and the County of Imperial to provide alternate access from Wheeler Road. Recreation activity will be authorized in the Superstition Mountain area as shown on Exhibit "D". The San Felipe Corridor is designated open to transiting vehicle traffic as shown on Exhibit "D".
4. Competitive events may be scheduled in the R-2510 RSZ "A", "B" and "C" areas with the following stipulations pertaining to the joint use of public lands for commercial, competitive, or other types of recreational events when authorized by "Special Recreation Permit".

- a. BLM and NAVY will each designate a competitive event coordinator and furnish to the other the name and address of the person so designated.
- b. It is agreed that at least 12 events per year will be allowed to take place either totally or partially within the R-2510 RSZ "A" and "B" areas. In any calendar month, at least one event will be allowed.
- c. The BLM will have a representative present at each event to help ensure compliance with the terms of the Special Recreation Permit.
- d. BLM will issue Special Recreation Permits for off-road events only within areas mutually agreed upon by the NAVY and BLM as being suitable for this purpose. The withdrawn area is available for use on a case-by-case basis, provided the event does not conflict with planned NAVY activities within the R-2510. BLM will notify the NAVY at least 30 days before an event is proposed for RSZ "A" and "B" areas as to the exact nature of the proposal. NAVY will respond to BLM within two (2) weeks after receipt of BLM's notification. BLM will notify the Commanding Officer in advance of a scheduled competitive event in RSZ "C" area.
- e. The collection and deposition of fees by BLM for Special Recreation Permits shall be made in accordance with the existing BLM regulations.
- f. Prospective competitive event sponsors apply for and area assigned event dates and locations through a lottery conducted by the BLM each August. By September 1, the BLM will furnish the NAVY a proposed schedule of events to be held within the R-2510 area during the upcoming calendar year, as determined by the lottery. The NAVY will notify the BLM as soon as possible of any scheduling conflicts with planned NAVY activities, and the event will be rescheduled to a date satisfactory to the BLM, the NAVY, and the event sponsor.

If no response is received from the NAVY by December 1, the BLM will assume that the schedule poses no conflict, and will begin issuing Special Recreation Permits for the individual events. As permits are issued, the BLM will provide the NAVY a copy of its letter to the permittee along with the course map.

- g. Sponsors occasionally make late application for events after the lottery has been held. The NAVY will allow the BLM to issue permits for off-road events on any weekend not already booked through the lottery, provided the BLM notifies the NAVY of the event application at least thirty (30) days prior to the proposed event date. The permit for such an event will contain a provision that the use is subject to postponement or cancellation by NAVY anytime prior to 1:00 p.m. Friday immediately prior to the weekend permitted. NAVY will inform both BLM and the event sponsor of the need to postpone or cancel any event so scheduled at the earliest possible time. The special provision in the permit will also require the event sponsor to contact NAVY at 1:00 p.m. Friday, if no prior notification has been received, to confirm the availability of the land.
- h. BLM will require as a stipulation to all Special Recreation Permits issues that the event sponsor will have comprehensive liability insurance in favor of the United States of America.
- i. Notwithstanding any other provisions, NAVY reserves the right to cancel and prohibit public access to the R-2510 RSZ "A" and "B" areas at any time without prior notice for any or all the the following:
 - (1) Temporary difficulty encountered in removal/recovery of test items if the exposure of such items to the general public might incur compromise of classified and/or national security information.
 - (2) A national emergency or disaster.

- (3) A priority assignment to utilize the area for any test which could pose a substantial personnel or equipment hazard to anyone entering on or within the area on an uncontrolled basis.

5. General recreation use in the Imperial Sand Dunes, R-2512 (East Mesa), lying east of the old Coachella Canal including access and campground developments currently existing are acknowledged and are hereby deemed compatible with the general standards associated with the RSZ "C" area and will require no change in operations. Organized events in the area will not require close coordination as required on the R-2510 (West Mesa) since the Canal provides a clear line for public awareness, and uses will not extend into RSZ "B".
6. The northern boundary of the Superstition Mountain Open Area will be enforced on the pole line road (see map 33 of the EIS and Exhibit A attached).

C. Signing and Posting

NAVY responsibilities for posting the area include sign production, installation, maintenance, and replacement.

1. NAVY will post signs for the withdrawn target areas (RSZ "A") and the Right-of-Way areas (RSZ "B") in a manner sufficient to inform the general public of:
 - a. Safety hazards resulting from authorized NAVY operations;
 - b. Access restrictions resulting from authorized NAVY operations;
 - c. All other restrictions, programs, or regulatory actions resulting from authorized NAVY operations.
2. BLM will be responsible for posting, maintaining, and replacing all recreation management signs not relating to authorized NAVY operations in the Right-of-Way and Cooperative Agreement (RSZ "B" and "C") areas.

D. Lands and Realty Program Management

1. Withdrawals

Navy shall make an appropriate filing for withdrawal of the target areas shown as RSZ "A" or

modifications thereof. Pending the approval of a Public Land Order, NAVY shall continue its use of the land under the existing BUREC-NAVY agreements.

Appropriate NEPA documentation will be determined through further BLM, BUREC, and NAVY coordination, including amendment of the Desert Plan.

The parties to this Cooperative Agreement agree that once signed by all parties, the agreement will be made a part of the Desert Plan.

Insofar as provided for in the BLM/BUREC Supplemental Land Resource Management Agreement (BUREC Contract No. 8-07-30-L0088, BLM Cooperative Agreement No. CA-105), dated May 23, 1978, BLM shall amend the Desert Plan to reflect its land use classes on the area of R-2510 (West Mesa) currently under BUREC withdrawal which was excluded from the final Desert Plan approved in 1980.

2. Rights-of-Ways and Cooperative Agreement

NAVY shall make an appropriate filing with BLM for a right-of-way covering the area shown as RSZ "B" on Exhibits "A" and "B". BLM and BUREC will retain jurisdiction; however, no other rights-of-way, leases, or permits contrary to this agreement will be granted without NAVY concurrence.

It is agreed that BLM has the sole right to grant rights-of-way, leases, or permits within the areas RSZ "B" and "C". BLM will contact the NAVY and BUREC for their concurrence on the adequacy of protective stipulations to be included in the granting documents within these areas before any such rights or privileges are granted. NAVY and BUREC shall respond in writing within two (2) weeks of receipt of the initial request for their concurrence. A non-response will be confirmed. Initial BLM request will be sent by Certified Mail - Return Receipt Requested to the Commanding Officer, and copy to the Western Division, Naval Facilities Engineering Command (Code 24), P.O. Box 727, San Bruno, CA 94066-0720 and the Regional Director, Lower Colorado Region, Bureau of Reclamation, P.O. Box 427, Boulder City, Nevada 89005, Attention: LC-420. Any disagreements, either between NAVY, BUREC and BLM, or between the applicant and the United States shall be handled as indicated in Section VI A above.

BLM shall have primary responsibility for monitoring authorized uses to insure compliance. Navy will report any sightings of suspected non-compliance to BLM.

It is agreed that existing utilities and/or right-of-way within RSZ "B" and "C" areas may remain without modification or movement. However, new installations or extensions to existing pole lines exceeding the heights established in Article V of this agreement will be subject to the concurrence of the Commanding Officer. Such concurrence may require as mitigation the installation of warning balls and/or warning lights for pilot safety.

For example, Corridor M, paralleling the East Highline Canal (R-2512 - East Mesa), may require warning balls and lights in the RSZ "B" and "C" zones where the constructed height exceeds the heights restrictions in the flight corridor listed in Article V of this agreement.

The cost of warning balls will be borne by the utility company or district. Costs of design, placement, operation, and maintenance of warning lights will be agreed upon by the Navy, BLM and applicant.

For the following specific corridors identified in the CDCA Plan, the following additional guidance is provided:

- a. Contingent Corridor T (p. 189, Appendix Volume G of the CDCA Plan) paralleling the Southern Pacific Railroad North of Glamis, is authorized not to exceed 100 feet in height except where height restrictions have higher limits.
- b. Corridor N is a designated utility corridor containing an existing San Diego Gas and Electric Company 500 kV line. Although the Existing right-of-way is located outside of the proposed boundaries of R-2510 (West Mesa) covered by this agreement, additional lines, if proposed in the corridor, will not exceed the as built height of the existing line if built parallel to and not over 500 feet from the existing line.
- c. Contingent Corridor Z is modified to exclude its utilization where it crosses RSZ "A". In RSZ's "B" and "C", the requirement of Article V of this agreement will be in effect.

3. Disposal of Land

It is agreed that the public interest requires retention of public lands within RSZ "B" and "C" areas in public ownership. Unless otherwise provided for by law, disposals will not generally be made unless they are clearly in the public interest and concurred in by both parties.

Current disposals of public lands now being processed may continue (i.e., all lands north of Highway 78 in T. 11 and 12 S., R. 09 and 10 E.) for the Ocotillo Wells State Recreation Vehicle Area. Acquisition by the California Department of Parks and Recreation may be processed at such time as the State applies.

4. Acquisition of Land or Easements

Additional lands or easements will be necessary for multiple use management. Where defined by land use plans, these acquisitions will be coordinated with the NAVY in RSZ "B" and "C". The San Felipe corridor easement acquisition will continue after alignment is mapped and will be hereby designated as open for use on the designated route. Additional corridor access through RSZ "B" will be subject to the concurrence of the Commanding Officer. Land Acquisitions within the San Sebastian Marsh will continue after coordination.

E. Minerals Management

1. Locatable Minerals

- a. RSZ "A" - Pursuant to the withdrawal these areas are not available to locatable mineral exploration or development.
- b. RSZ "B" and "C" - Pursuant to the current withdrawals by BUREC, these lands are not available to locatable mineral exploration or development. In the event any BUREC withdrawn land is revoked or terminated, or on lands not now under withdrawal, the lands shall be open to location. All actions shall be regulated under 43 CFR 3802 and 43 CFR 3809, as applicable. Plan of operations will be required which will reflect hazards associated with NAVY use of airspace and height restrictions which may be imposed as well as other limitations on surface uses near target areas.

On receipt of plans of operation BLM will contact NAVY for their concurrence. Notification, review, response and appeals shall be handled in the same manner and time frames as indicated in Section VI A and D 2 above.

Pursuant to Section 601 (f) of FLPMA stipulations attached to mining plans of operations may be carried over to any mineral patents issued.

2. Oil and Gas Pre-Lease, Leasing and Post Lease Operations (RSZ "A")

Oil and gas leasing requests will be processed in accordance with procedures established by the Memorandum of Understanding for the Onshore Oil and Gas and Geothermal Program between the Department of Defense and the Department of the Interior of January 1984. A leasing request prior to leasing will require the review, recommendations, and leasing stipulations from the Commanding Officer through his chain of command. The final approval or rejection of a request will be made by the Director, Installations and Facilities under the Secretary of the Navy. Depending on the complexity of the issues, the final review decision may take as long as six months, more or less. In the event of a negative decision, the Director, Installations and Facilities will provide full justification for denial of the lease application.

Lease offer involving BUREC withdrawn land will also be referred to the Regional Director for comment and recommendations. BLM will remain the lead agency for leasing and will provide the NAVY and BUREC with copies of leases and pertinent documents.

Monitoring after lease issuance shall be the responsibility of BLM. Normally the BLM is responsible for shut down of non-complying operations; however, the Commanding Officer may shut down an operation in emergencies and immediately notify BLM.

3. Oil and Gas Leasing and Post Lease Operations (RSZ "B" and "C")

The Commanding Officer may notify BLM of any observed non-compliance or unsafe or emergency situation which may require BLM to shut down or restrict operations.

Oil and gas leasing applications and post lease operations will be handled by BLM in accordance with normal procedures except that NAVY will be consulted and appropriate height and use restrictions may apply.

4. Oil and Gas Geophysical Operations - Vibrosis, etc.

In RSZ "A" NAVY is the sole authorizer if any such use is allowed.

BLM is lead agency in RSZ "B" and "C". Since only a notice of intent need be filed no review time can be afforded NAVY, but the Area Manager will notify the Commanding Officer and will include appropriate warnings and stipulations in confirmation to operators. BLM will monitor operator. The Commanding Officer will notify BLM immediately when incidents of noncompliance are observed. The Commanding Officer may not shut down operator but will contact BLM and request such action.

5. Geothermal Pre-Lease, Leasing, and Post Lease Stage

Same as for oil and gas.

6. Geothermal Operations

Pre-Lease Operations:

Same as with geophysical for oil and gas, except that a two (2) week review period will be afforded the Commanding Officer prior to BLM approving permits.

Lease Issuance and Post Lease Operations:

The Commanding Officer may impose leasing stipulations such as height and steam vapor restrictions at certain time periods which are reasonable to BLM with input allowed from lessee.

7. Saleable Minerals

Mineral materials, e.g., sand and gravel, may be sold from all lands, although generally not from areas in RSZ "A" due to extreme hazards.

Upon receipt of an application, BLM and NAVY will meet with the operator to discuss proposed operation and possible restrictions within three (3) weeks.

BLM will remain the lead agency for the sale of material and provide the Commanding Officer with copies of the contracts and pertinent documents.

Monitoring will be the responsibility of BLM who may shut down or restrict the operator at the request of the Commanding Officer.

VII. PUBLIC SAFETY

A. Range Safety Zones

1. RSZ "A"

The Commanding Officer is the sole responsible agent of the federal government for the public safety in these areas. Public safety and law enforcement will be the responsibility of the NAVY.

2. RSZ "B"

The District Manager in cooperation with the Commanding Officer will provide for public safety in this area. As part of the CDCA plan amendments, BLM and NAVY will prepare operational plans as part of this agreement to increase public safety.

3. RSZ "C"

The District Manager is the responsible agent for public safety in this area. Appropriate coordination and pre-planning for safety requirements with the Commanding Officer will occur.

4. AIR SPACE

The NAVY will suspend flight operations upon a showing of need for air space clearance for emergency operations such as Search and Rescue. Generally this will be on request through the Federal Aviation Administration (FAA) or appropriate law enforcement organizations.

VIII. FACILITY PROTECTION

A. Range Safety Zones

1. RSZ "A"

The Commanding Officer is the sole responsible agent of the federal government for the operation, maintenance, and utilization of the target complexes. The location of each is identified as RSZ "A" and shown on Exhibits "A" and "B".

The Commanding Officer is responsible for the protection of the health and safety of all personnel (military and civilian) within the boundaries of the target complex, and for the continuing preservation of each target complex to perform its mission of air warfare training, desert survival training, desert warfare training, and parachute research, development and training.

2. RSZ "B" and "C"

The District Manager or Area Manager is the responsible agent of the Federal Government for the multiple use and sustain yield management of the federal lands in this area. Appropriate coordination and pre-planning of land use with the Commanding Officer will occur.

IX. COOPERATIVE AGREEMENT IMPLEMENTATION

- A. NAVY will submit the appropriate applications to BLM pursuant to this agreement.

- B. BLM will prepare CDCA plan amendments as necessary, beginning in 1985, to be linked with any environmental document required as part of any application. The amendment(s) to the CDCA plan will address, at a minimum, areas to be added to or deleted from the jurisdiction of the CDCA as a result of this agreement. NAVY will reimburse BLM for the work of preparing, publishing and completing appropriate environmental documentation.

X. NAVY-BLM INTERIM MANAGEMENT

Pending completion of those points defined in the Implementation Section of this agreement (Section IX, A and B), the following will take effect immediately with the signing of this document.

- A. The stipulations and conditions as agreed upon herein will take effect on those RSZs within the BLM-BUREC-NAVY lease area not covered by the CDCA plan.
- B. The stipulations and conditions as agreed upon herein will take effect concurrent to finalizing CDCA plan amendments or other decision documents prepared to realize the preferred, compatible uses of RSZ "A", "B", and "C" where they occur on federal lands.
- C. The complete and thorough coordination with the Imperial County Board of Supervisors, other county, state and federal agencies, and other public land users as required.
- D. All pre-application agreements of Section IX. A.

IX. APPROVAL

DEPARTMENT OF NAVY

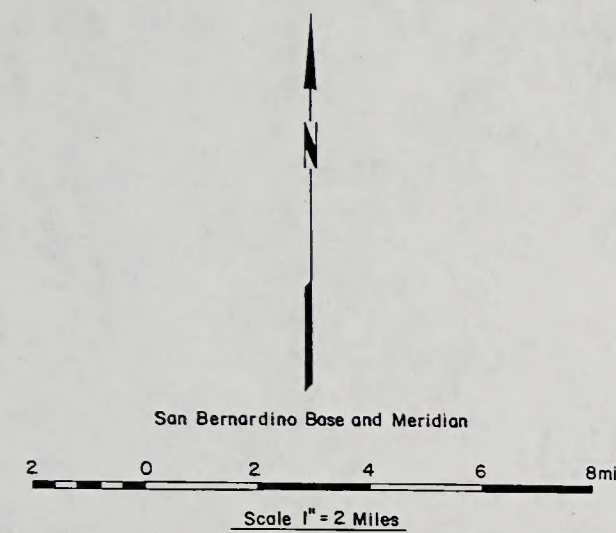
DATE _____

BUREAU OF RECLAMATION

DATE _____

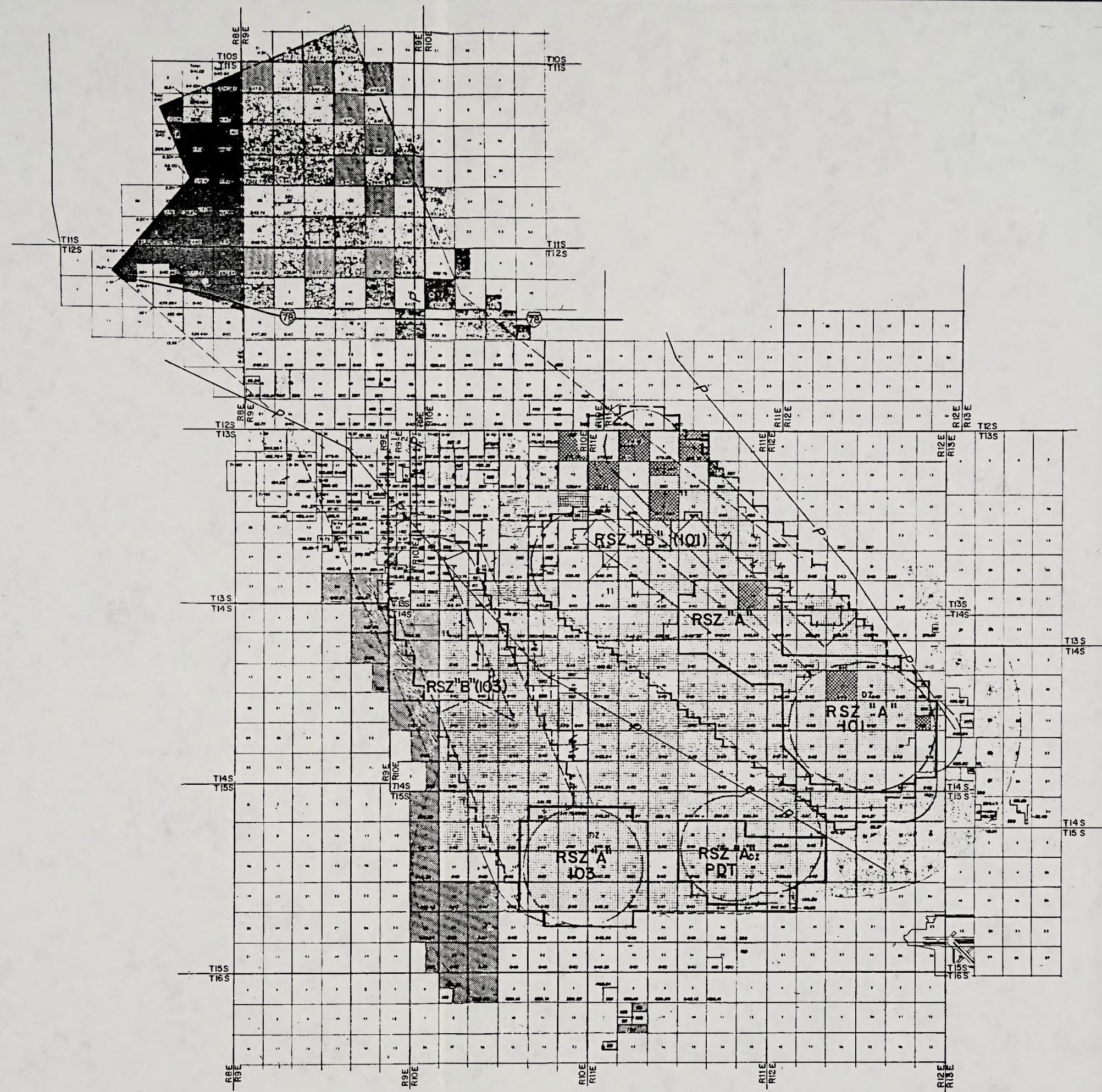
BUREAU OF LAND MANAGEMENT

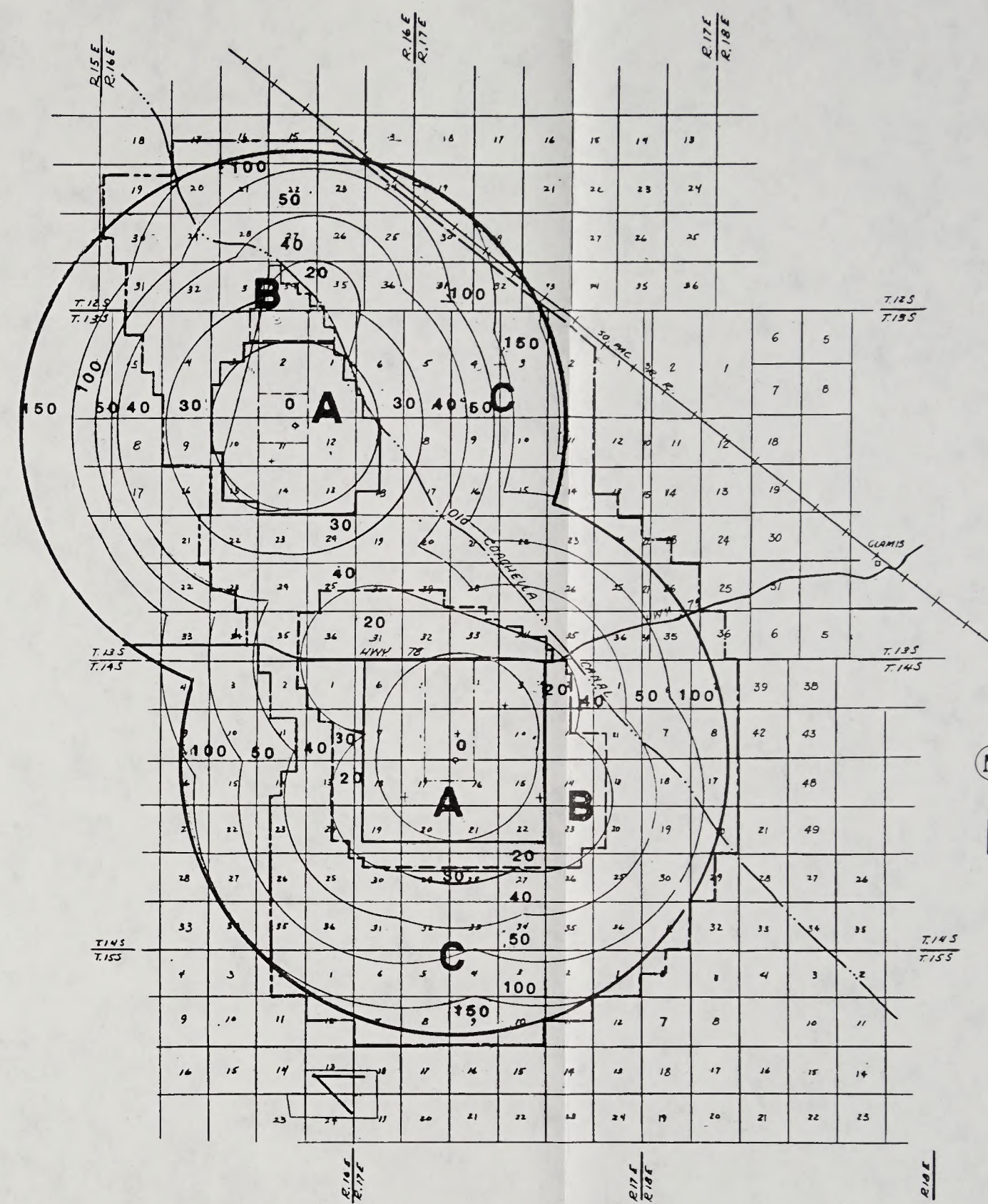
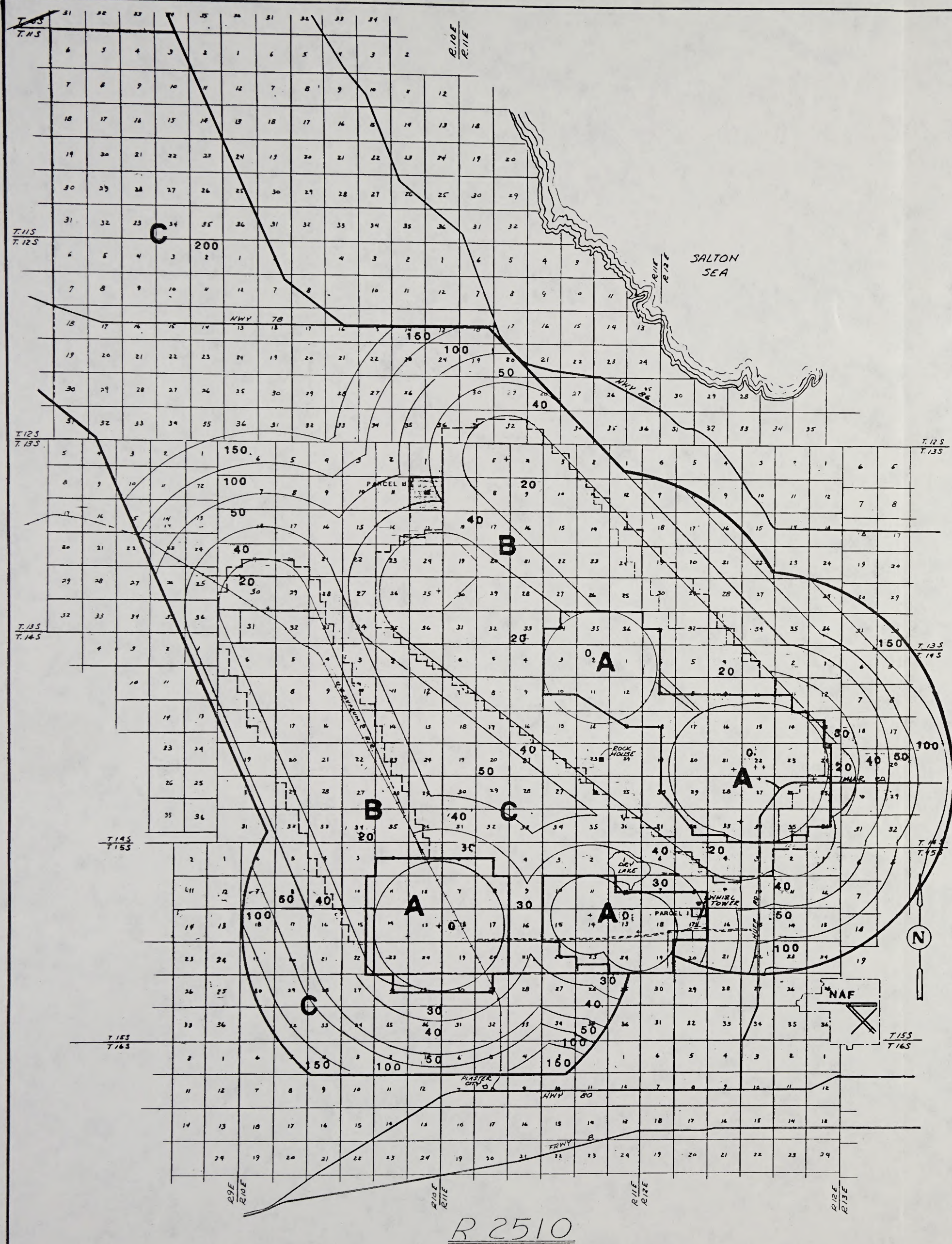
DATE _____



LEGEND

- Public Domain Land Withdrawal Parameter (RSZ "A")
- Right of Way Parameter (RSZ "B")
- Cooperative Agreement Parameter (RSZ "C")
- Road (Highway)
- Power Line



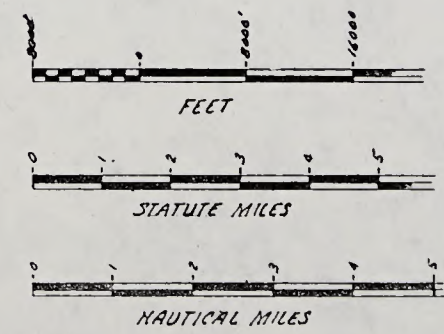


R 2512

NOTE:
THE CONTOUR LINES SHOWN ON THIS CHART
DENOTE HEIGHT RESTRICTIONS AS DETERMINED
BY PROXIMITY TO HAE TARGET AREAS
NEW CONSTRUCTION WILL NOT BE PERMITTED
TO EXCEED THESE HEIGHTS.

LEGEND
--- EXIST. RANGE BDRY
--- PROP. LAND ACQUISITION
00 HEIGHT RESTRICTION

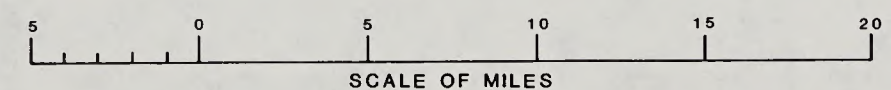
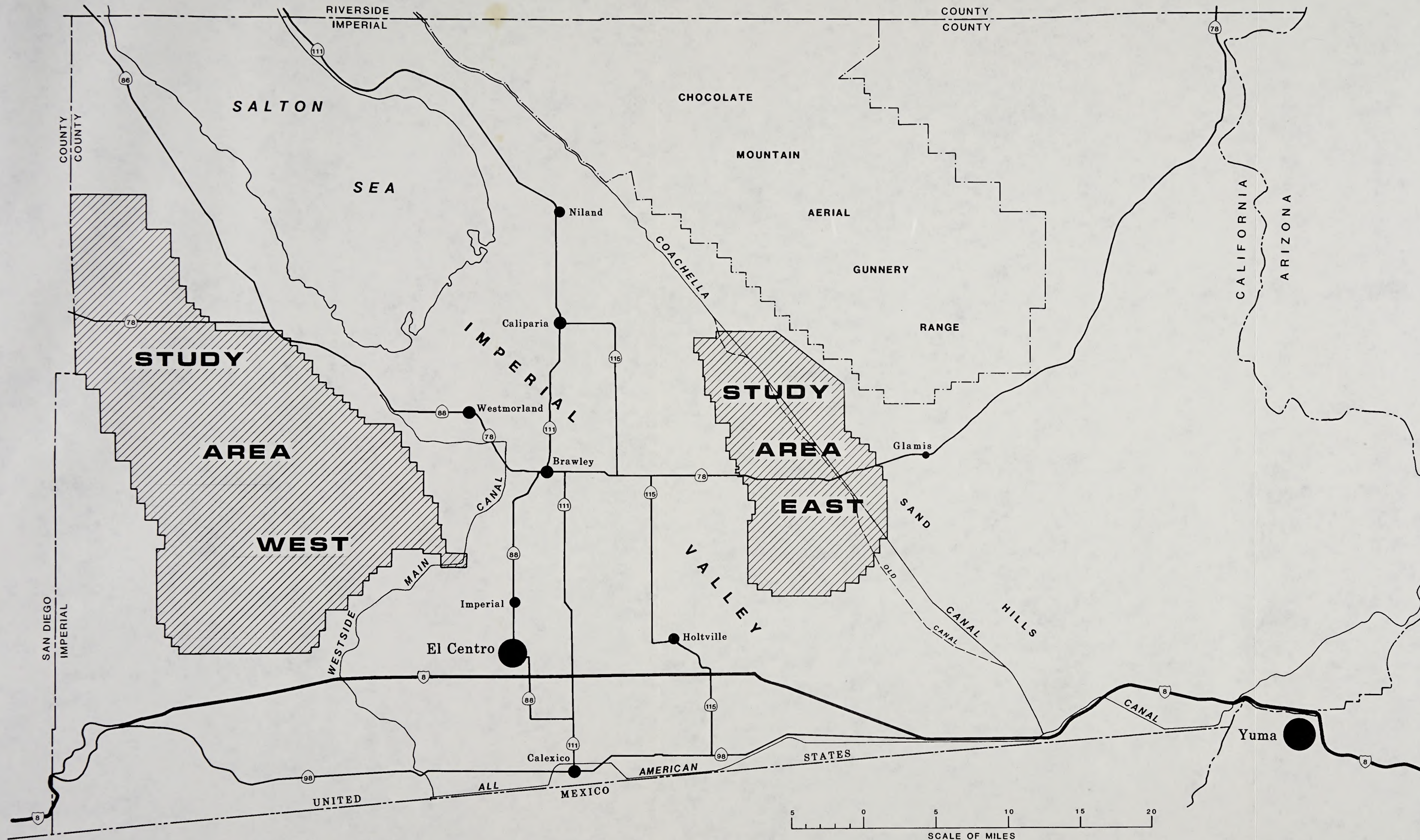
EXHIBIT C



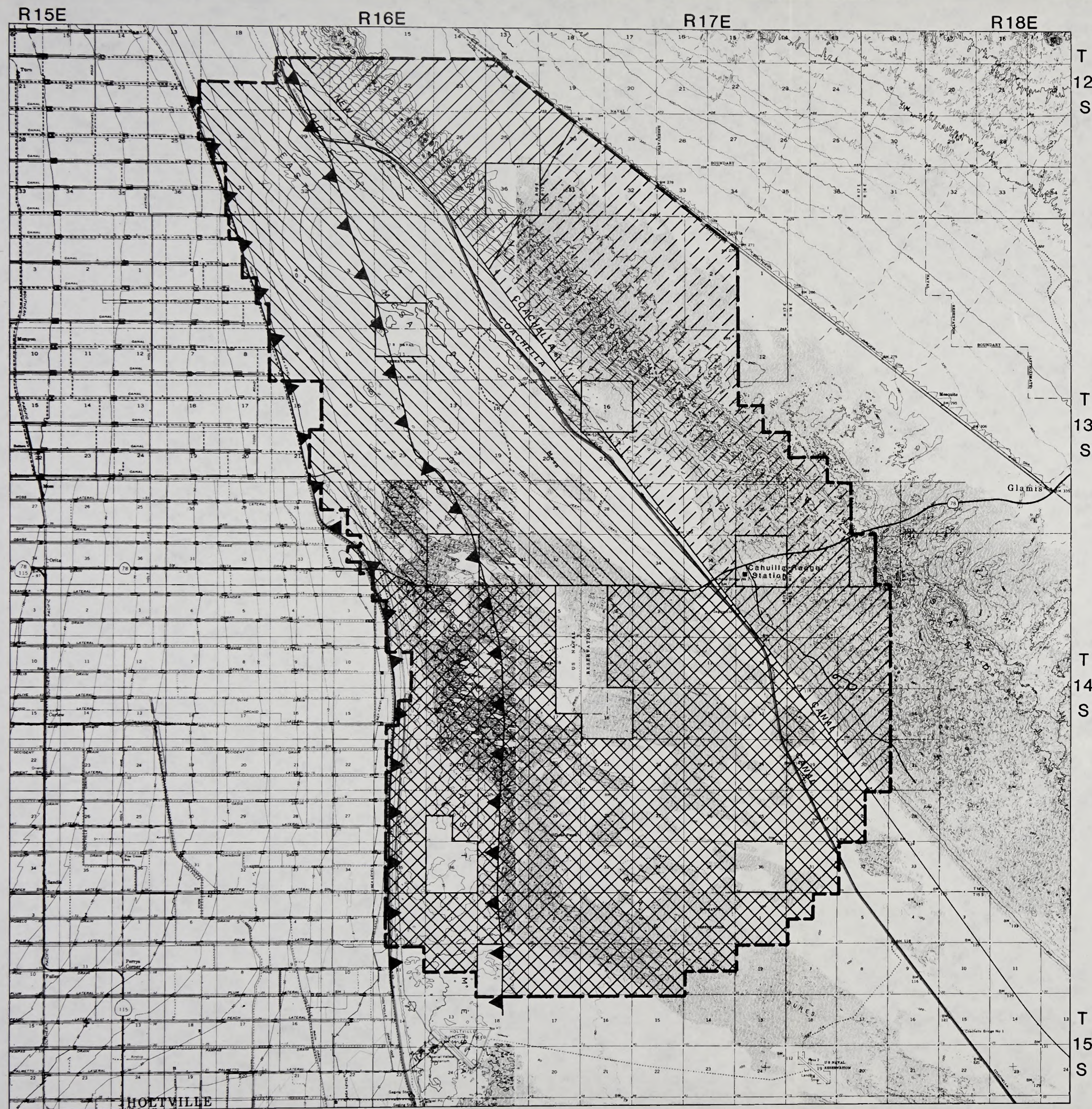
WEST DIV DWG NO.
C-102637

PWO DWG REF		DEPARTMENT OF THE NAVY		NAVAL FACILITIES ENGINEERING COMMAND	
DRAWN M.M.A.		NAVAL AIR FACILITY		EL CENTRO CALIFORNIA	
CHECKED		DATE		R2510 & R2512	
ENGINEER		DATE		LAND WITHDRAWAL	
APPROVED		DATE		HEIGHT RESTRICTIONS	
PUBLIC WORKS OFFICER		DATE		CODE IDENT NO. SIZE	
SATISFACTORY TO		DATE		1316-250 F	
TITLE		DATE		NAVFAC DRAWING NO.	
		DATE		P.W. 945	
		DATE		SPEC	
		DATE		SCALE NOTED	
		DATE		SHEET 1 OF 1	

MAPS

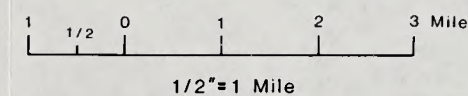


AMENDMENT 1
NAVY / BLM
COOPERATIVE AGREEMENT
LOCATION MAP



LEGEND

- Study Area Boundary
- ▨ Class "C"
- ▨ Class "I"
- ▨ Class "L"
- ▩ Class "M"
- Unclassified
(includes Patented & other Federal land)
- ▲ Energy Production and Utility Corridor



MAP-8 AMENDMENT-1 NAVY / BLM COOPERATIVE AGREEMENT ALTERNATIVE-B (NO ACTION) MULTIPLE USE CLASS AND UTILITY CORRIDOR

EAST SIDE

R9E

R10E

R11E

MAP-32

AMENDMENT-1
NAVY / BLM
COOPERATIVE AGREEMENT
ALTERNATIVE-E
(DECISION)
MULTIPLE USE CLASSES

LEGEND

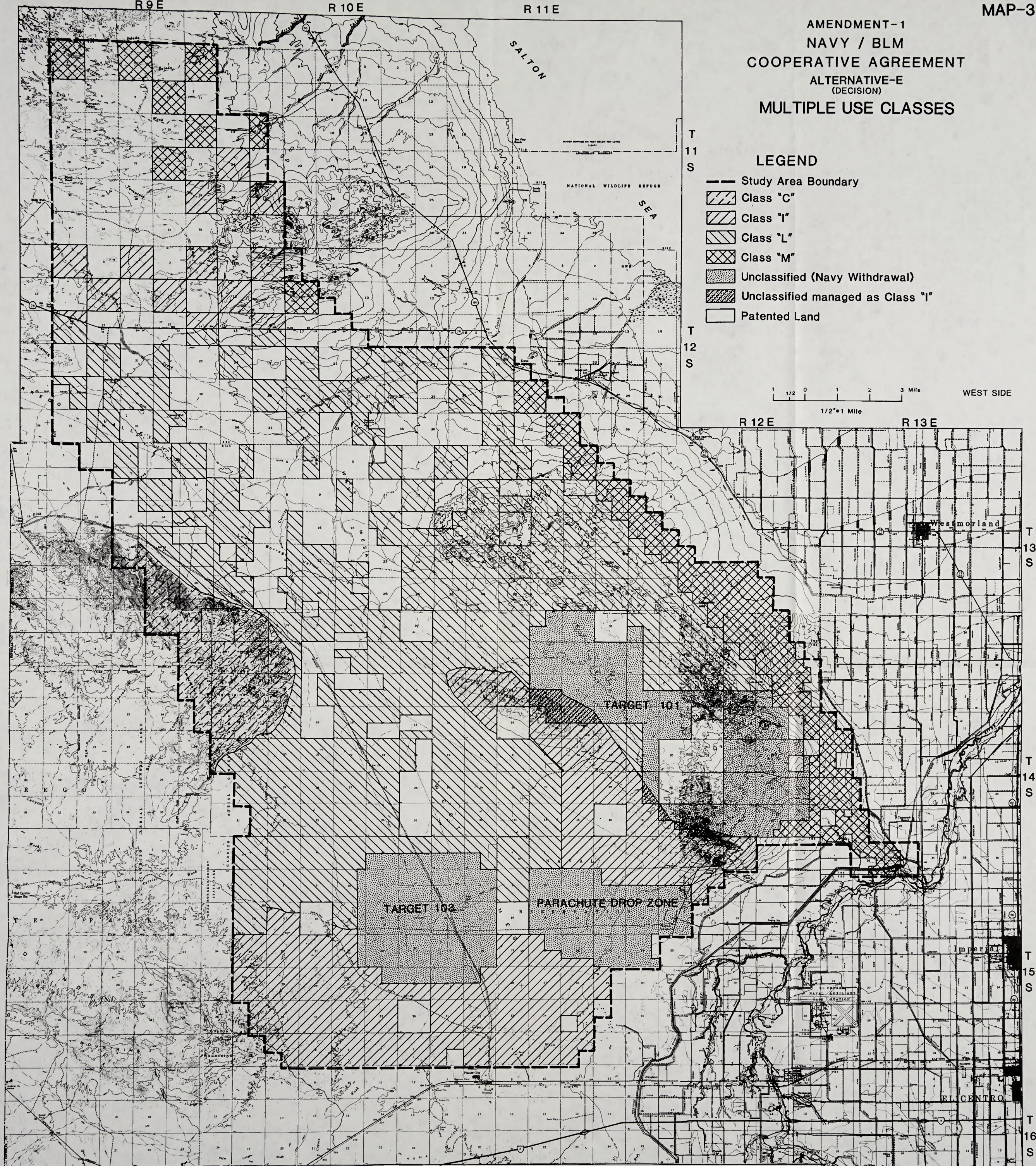
- Study Area Boundary
- Class "C"
- Class "I"
- Class "L"
- Class "M"
- Unclassified (Navy Withdrawal)
- Unclassified managed as Class "I"
- Patented Land

1 1/2 0 1 2 3 Mile
1/2" = 1 Mile

WEST SIDE

R12E

R13E



AMENDMENT-1
NAVY / BLM
COOPERATIVE AGREEMENT
ALTERNATIVE-E
(DECISION)

MOTORIZED VEHICLE ACCESS

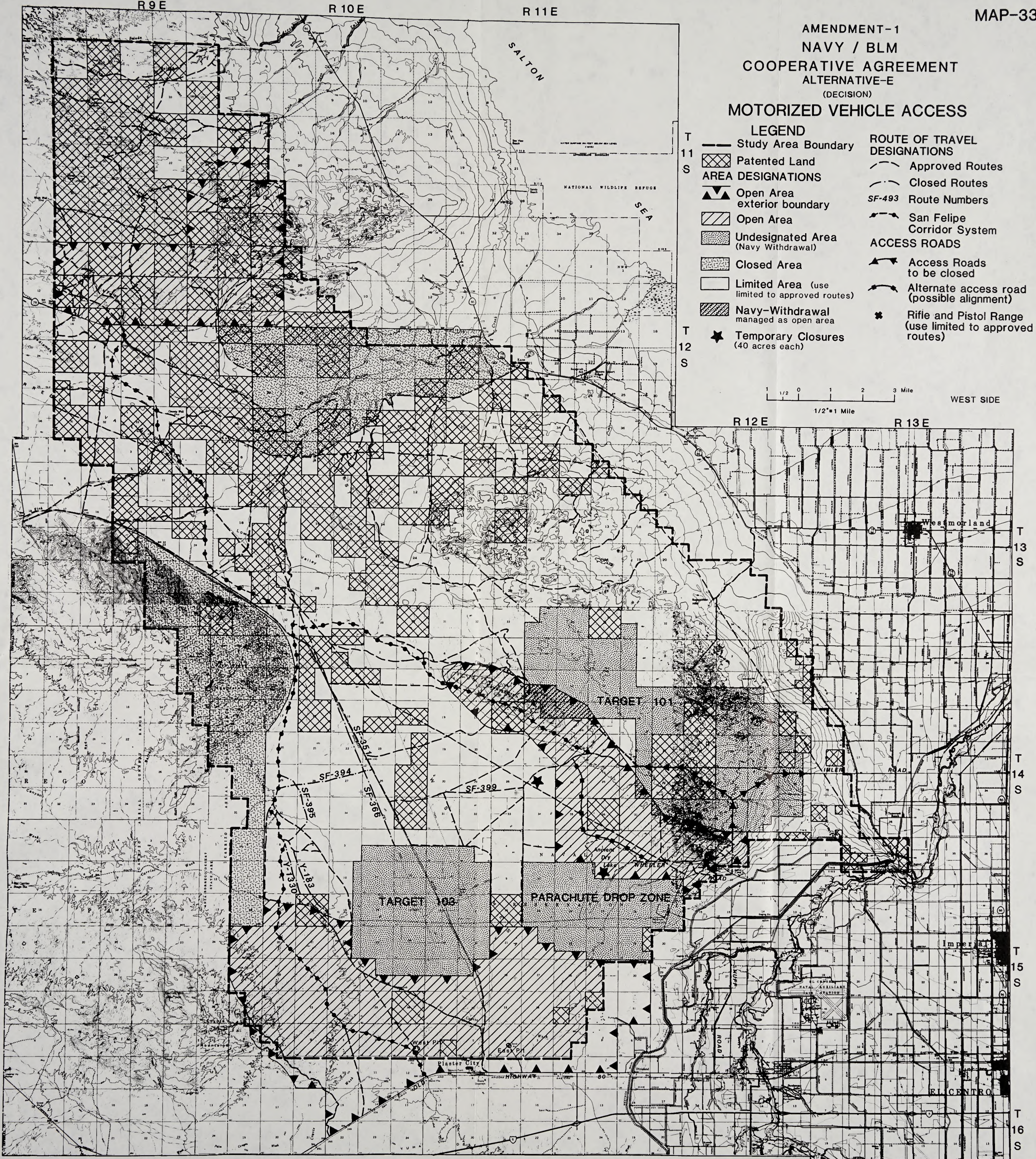
LEGEND

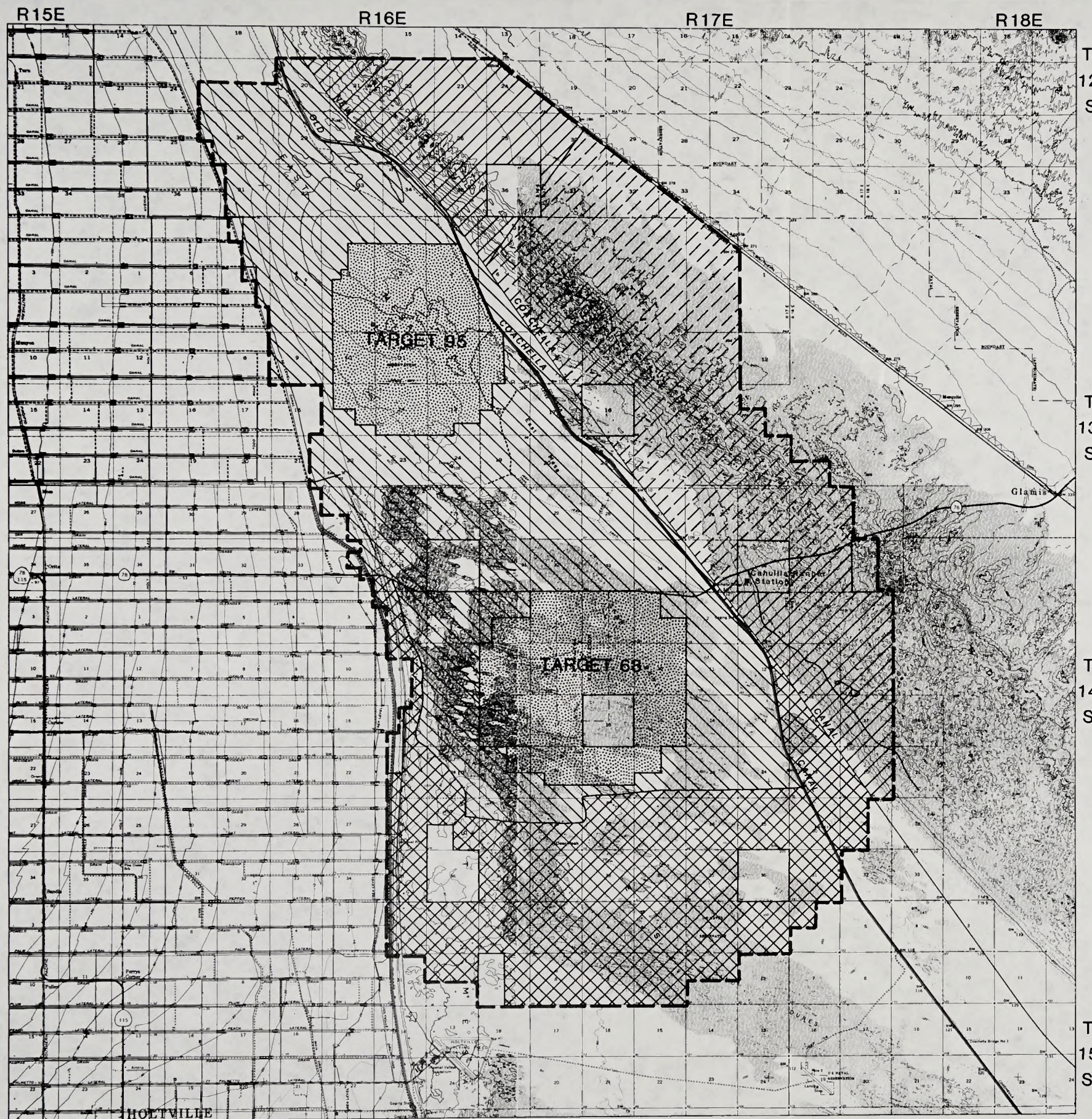
- | | |
|--|--|
| <p>AREA DESIGNATIONS</p> <ul style="list-style-type: none"> Patented Land Open Area exterior boundary Open Area Undesignated Area (Navy Withdrawal) Closed Area Limited Area (use limited to approved routes) Navy-Withdrawal managed as open area Temporary Closures (40 acres each) | <p>ROUTE OF TRAVEL DESIGNATIONS</p> <ul style="list-style-type: none"> Approved Routes Closed Routes SF-493 Route Numbers San Felipe Corridor System <p>ACCESS ROADS</p> <ul style="list-style-type: none"> Access Roads to be closed Alternate access road (possible alignment) Rifle and Pistol Range (use limited to approved routes) |
|--|--|

1 1/2 0 1 2 3 Mile

1/2"=1 Mile

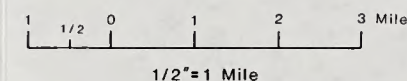
WEST SIDE





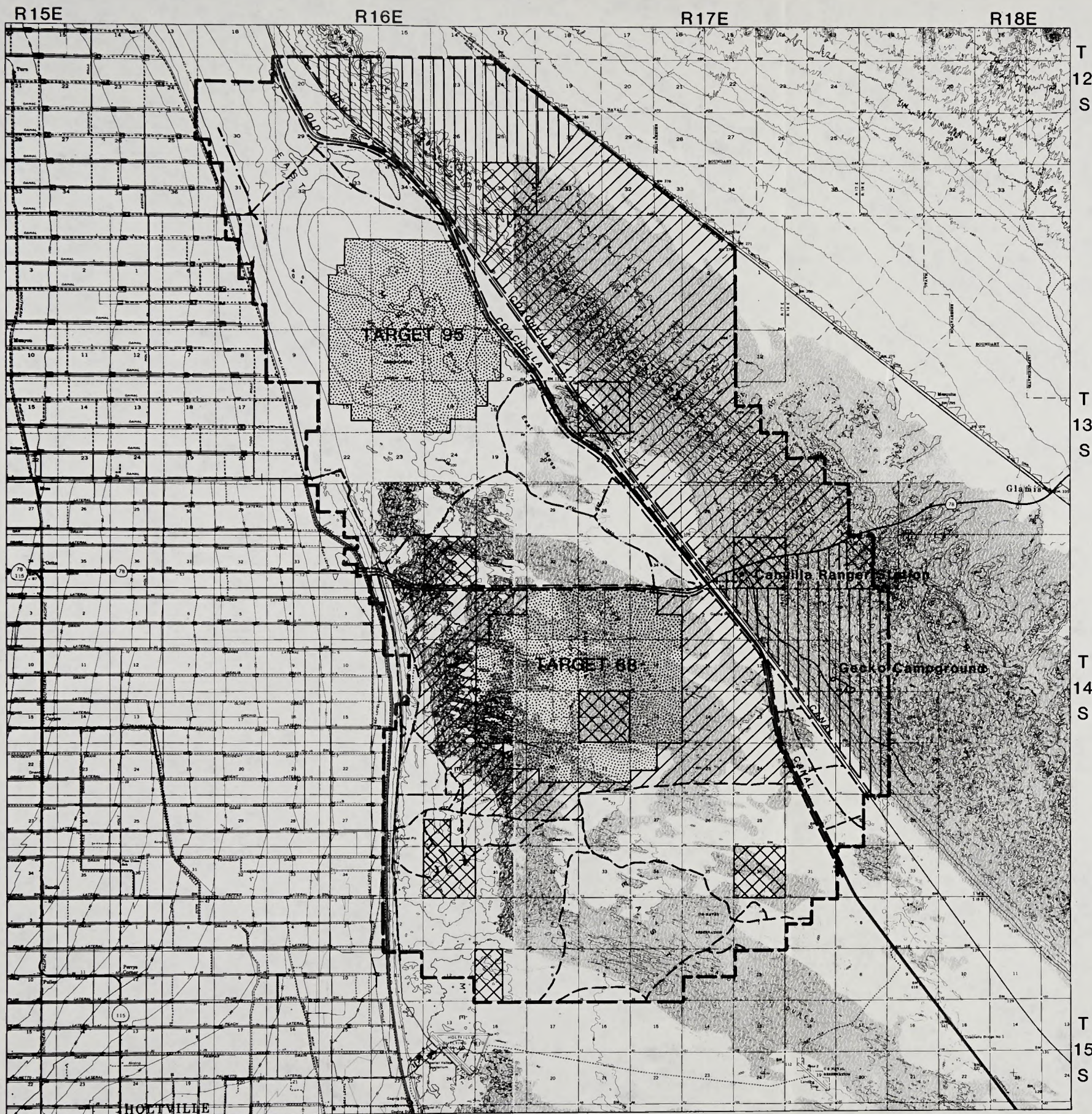
LEGEND

- Study Area Boundary
- Class "C"
- Class "I"
- Class "L"
- Class "M"
- Unclassified
- Patented Land (includes State & local government)



MAP-34 AMENDMENT-1 NAVY / BLM COOPERATIVE AGREEMENT ALTERNATIVE-E (DECISION) MULTIPLE USE CLASSES

EAST SIDE

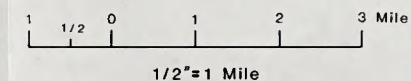


LEGEND

- Study Area Boundary
- Patented Land
- AREA DESIGNATIONS
- Open Area
- Closed Area
- Limited Area (use limited to approved routes)
- Undesignated Area (Navy Withdrawal)

ROUTE OF TRAVEL DESIGNATIONS

- Approved Route
- Closed Route



MAP-35 AMENDMENT-1 NAVY / BLM COOPERATIVE AGREEMENT ALTERNATIVE-E (DECISION) MOTORIZED VEHICLE ACCESS

EAST SIDE

BLM Library
Denver Federal Center
Bldg. 50, OC-521
P.O. Box 25047
Denver, CO 80225

Ma. a n n. 2

Ma. a n n. 1

~~Ma. a n n. 1~~